

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: JUL 11 1996

SUBJECT: On-Scene Coordinator's Report - Removal Action at the Standard Scrap  
Metal/Chicago International Exporting Site in Chicago, Illinois  
(Site ID # HQ)

FROM: Rick Karl, Chief *Thomas Sealed*  
Emergency Response Branch *for*

EPA Region 5 Records Ctr.



246156

TO: Paul Nadeau, Center Director  
Region 5

Thru: *William Muho*  
William Muho, Director  
Superfund Division

Attached please find the On-scene Coordinator's Report for the removal action conducted at the Standard Scrap Metal/Chicago International Exporting Site ("SSM/CIE Site") located in Chicago, Illinois. The report follows the format outlined in the National Contingency Plan (NCP), Section 300.165. This removal began on November 1, 1994 and was completed on January 30, 1996. The OSC dedicated to the project was Steven J. Faryan.

The site posed an immediate threat to human health and the environment. The time critical removal action was taken to mitigate the threats posed by releases of PCB and Lead contaminated dust and dirt to soil, streets, sidewalk and neighboring residences. In addition, high levels of PCB and Lead were found at the surface of the site which posed a direct contact threat to the public and to workers at the SSM/CIE site.

Costs under the control of the OSC totaled \$3,129,946.01, of which \$ 3,091,623.32 was for the ERCS contractor.

The costs submitted in this OSC Report are estimates only, subject to final audit and definitization by U.S. EPA. The OSC Report is not a final reconciliation of the costs associated with a particular site.

Portions of the OSC report appendices may contain confidential business information or enforcement sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

The site is not on the National Priorities List.

Attachment: OSC Report

**FEDERAL ON-SCENE COORDINATOR'S REPORT**

**Standard Scrap Metal/Chicago International Exporting  
4004 - 4020 South Wentworth Avenue  
4000 - 4027 South Wells Street  
Chicago, Illinois**

**October 1994 through January 1996**

**UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
STEVEN J. FARYAN  
ON-SCENE COORDINATOR**

**SITE:** Standard Scrap Metal\Chicago International Exporting

**LOCATION:** Chicago, Illinois

**PROJECT DATES:** October 1994 through January 1996

**INCIDENT DESCRIPTION:** The Standard Scrap Metal\Chicago International Exporting site ("SSM/CIE Site" or "Site") is an active 2.7 acre scrap processing facility. The Site is not on the National Priority List (NPL). The Site consists of two parcels of land separated by Wells Street, referred to as the Main Yard and the West Yard. The site operations over the past 50 years included scrap processing, operation of a wire incinerator, shredding and copper stripping of electrical motors, transformers, and generators, and operation of two incinerators to reclaim aluminum from motors, cans, and machinery. At present, the site is owned\operated by Lawrence Cohen and Steve Cohen, and operated under Chicago International Exporting, and Chicago International Chicago, Inc. ("CIE/CIC"). CIE\CIC conducts scrap shredding, copper grinding, and aluminum reclamation, as well as buying unshredded or pre-shredded loads of electric motors and selling the loads without further on-site processing ("motors-in motors-out"). The shredder operation, grinder operation, and motors-in motors-out operation result in the production of fluff material containing high concentrations of Polychlorinated biphenyl (PCBs), and/or dust and dirt containing high concentrations of PCBs and heavy metals. Shredding operations also result in the production of copper fines material containing high levels of PCBs.

PCBs, Lead, cadmium, and other heavy metal contamination of the soil occurred due to past and present operations at the site over the past 50 years. Under the previous name of Standard Scrap Metal, scrapping and burning of PCB transformers and operation of the wire incinerator at the Site caused PCB and Lead contamination to be released directly to the soil. In addition, scrap incineration operations at the site under both Standard Scrap and CIE/CIC have caused PCB, Lead and other heavy metals to be released to the Site, sidewalks and street. Samples collected from stockpiles of dirt, debris and metal confirmed high levels of Lead, cadmium, and PCBs which are regulated under RCRA and TSCA rendering the materials hazardous wastes and hazardous substances.

Illinois Environmental Protection Agency ("IEPA") conducted a preliminary site inspection of the Main Yard and West Yard and alerted the Emergency and Enforcement Response Branch (EERB) of the United States Environmental Protection Agency (U.S. EPA) to the high levels of PCB's and lead found at the site which borders a residential neighborhood.

**ACTIONS:** EPA and the technical assistance team (TAT) contractor Ecology and Environment, Inc., (E & E) conducted site assessments in February of 1994 and again in August and in October 1994 and documented conditions which met the criteria for a time

critical removal action. Thus, the emergency removal contracting services (ERCS) contractor Riedel Environmental Services (RIEDEL) was mobilized on November 1, 1994, and began implementing the site removal (mitigative) actions.

Due to the location of the site in a high crime neighborhood, 24 hour armed security was provided at the site. In spite of the security, vandalism and theft occurred at the site. The EPA command post was first established on Wells Street and later moved into the West Yard. The site fence was repaired and warning signs were posted along the perimeter of the site. The site area was demarcated into 25 feet square grids and pre-excavation samples were collected from a majority of the grid nodes.


Based on the analytical results of the pre-excavation samples, contaminated soil was excavated, segregated and stockpiled into the PCB contaminated soil pile and the PCB and heavy metal contaminated soil pile. The Main Yard clean up consisted of excavation of contaminated soil, removal of hazardous waste stockpiles, decontamination of shredder and grinder areas, and decontamination of paved areas. Contaminated soil, dust and debris totaling 12,487.66 tons was shipped in 136 rail-cars to ENVIROSAFE Services in Grandview, Idaho.

Excavation in West Yard also unearthed an underground storage tank (UST) with 20,600 gallons of combustible liquid and water contaminated with PCBs which was disposed of at Breslube facility in East Chicago, Indiana. All site equipment and trailers were demobilized on June 16, 1995. Power to the site was disconnected on June 19, 1995 and the ERCS crew was demobilized after shipping the last two rail-cars containing hazardous waste material.

U.S. EPA and their contractor, Riedel Smith Environmental, remobilized to the site after court access was ordered from January 26 through January 30, 1996 to remove and dispose of six railcars of PCB contaminated copper fines to Envirosafe Services in Grandview, Idaho.

U.S. EPA Region V personnel assembled a multi-media team to address operational concerns and compliance issues at the Site. A Unilateral Administrative Order ("UAO") issued to CIE/CIC was successful in stopping the facility from further releases of PCB and Lead contamination onto the property, soil and into the environment. The UAO called for a process sampling plan and Operational Plan which the facility is currently implementing during its operation.

This time critical removal action was completed in accordance with CERCLA, and all response actions and costs incurred are not inconsistent with the National Contingency Plan (NCP).

  
Steven Faryan, OSC  
U.S. EPA, Region V  
Chicago, IL

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**Emergency and Enforcement Response Branch  
Office of Superfund, U.S. EPA, Region V  
OSC Report Standard Appendices List \***

Site Name: Standard Scrap Metal/Chicago International Exporting Site ID#: HQ Delivery  
Order #: 5001-05-357

<b>1. Operational Files</b>	<b>ID#</b>
- Action Memos/Additional Funding	1-A
- POLREPs	1-B
- Site Entry/Exit Log	1-C
- Hot Zone Entry/Exit Log	1-D
- Site Safety Plan	1-E
- Site Logs	1-F
- Daily Work Orders	1-G
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- General Correspondence/Information	1-K
 <b>2. Financial Files</b>	 <b>ID#</b>
- Delivery Orders	2-A
- TAT Technical Direction Documents	2-B
- Daily Cost Reporting U.S. EPA Form 1900-55's	2-C
- Daily Cost Summaries/ERCS Invoices	2-D
- Subcontracts Bids	2-E
 <b>3. Technical Files</b>	 <b>ID#</b>
- Sampling Plan	3-A
- Analytical Results/QA/QC	3-B
- Manifests	3-C
- Disposal Information	3-D
- Chains of Custody	3-E
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- Site Computer Disks/OSC Report	3-G

\* Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

\* Note that certain files for this site are maintained elsewhere by EERB; these appendices are

those files maintained by the OSC during the removal action.

## **I. Summary of Events:**

### **A. Site Conditions and Background:**

**1. Initial situation:** The Standard Scrap Metal/Chicago International Exporting Site, which is not listed on the NPL, is an active scrap processing facility, conducting site operations on two parcels of land totaling 2.7 acres. The site soil, dust and debris were contaminated with PCBs, lead, cadmium and other heavy metals. The contamination is resultant from past and present operations including; scrap processing, copper stripping of electric motors and PCB transformers, copper grinding, buying and selling unprocessed loads of electric motors, and reclaiming aluminum from electric motors and machinery by smelting in an incinerator. Site owners/operators have changed since the Site began operations. Mr. Lawrence Cohen was an owner/operator of Standard Scrap Metal. The Site is currently owned/operated by Lawrence Cohen and Steve Cohen, and is operated under the name Chicago International Exporting and Chicago International Chicago, Inc., (CIE/CIC). Between approximately 1987 and the present CIE/CIC conducted one or more of the following four different operations at the site:

- 1) Scrap shredding
- 2) Copper grinding and Separation
- 3) Aluminum smelting
- 4) Buying and selling unprocessed or pre-processed loads of scrap electric motors ("motors-in motors-out")

For all these operations, the raw materials like scrap metals, steel, motors, etc., are procured from other scrap yards and industrial clients.

**Scrap shredding:** Scrap shredding occurred at the Site between approximately 1992 and 1995 by CIE/CIC. Scrap shredding involves metal, steel, small electric motors and other ferrous and nonferrous materials being passed through a shredder. After shredding, several magnetic drum separators and conveyors separate the shredder materials into copper, ferrous, and nonferrous piles. Shredding operations have generated PCB and lead contaminated fluff (an organic waste product contaminated with PCB and lead), mica, and other PCB and lead contaminated visible dust and emissions which have been released to the CIE/CIC property and to the neighborhood. Prior to the initiation of the U.S. EPA removal action, there was no air pollution or dust collection equipment on the shredder and visible emissions were documented releasing to

the streets, sidewalks and neighboring residents by U.S. EPA on numerous occasions. Samples of the fluff and scrap copper which was continuously being released to the CIE/CIC yard and to Wells Street and the sidewalk during operations indicated levels of PCB's greater than 50 ppm, and lead contamination up to 20,000 ppm. Sampled material is regulated under TSCA and/or RCRA..

**Copper grinding:** Grinding operations occurred at the Site between approximately 1992 and 1995 by CIE/CIC. Medium to large size motors are used in this operation. Motors were manually stripped of copper by using flame torches, air hammers, and chisels. This operation also released PCB and lead contaminated fluff, mica, and other materials associated with electric motors. Copper wires and other materials removed from the motors were passed through a series of grinders inside the Main Building of the site. The final step involved gravity separation, where the ground material separated into copper, aluminum, and other metal piles. Grinding operations resulted in large amounts of fluff, mica, and other air borne emissions. These grinders were directly vented onto Wells Street and on to the sidewalk when U.S. EPA conducted its first site inspection. CIE/CIC then attempted to connect a cyclone separator that ultimately released the PCB and lead contaminated fluff to the outside of the building where CIE/CIC workers were present. During the beginning of the removal action the dust and fluff, which was highly contaminated with PCB and lead, was directly discharged to the sidewalk and Wells street and ultimately into the neighborhood. Prior to the initiation of the removal action and throughout most of the removal action, no pollution control equipment was installed on the grinding operation.

**Aluminum smelting:** Smelting or incineration operations occurred at the Site between approximately 1948 and the present by Standard Scrap and CIE/CIC. Aluminum machinery, electric motors and other aluminum scrap are melted in a furnace using natural gas. No operational air emission control equipment is used on the furnace.

**Motors-in motors-out:** CIE/CIC also purchases loads of unshredded, pre-shredded, and/or sorted electric motors, and then sells the motors without shredding to firms in China for reprocessing. Loads of unprocessed electric motors, as well as loads of pre-sorted, and pre-shredded material were found to contain varying amounts of PCB and heavy metal contaminated dust and dirt.

**Standard Scrap:** Past operations at the Site included dismantling PCB contaminated transformers and incinerating PCB contaminated scrap metal. Past operations caused PCB contaminated oil to be poured or released directly on the ground at the Site, and/or PCB contaminated dust to be released at or

from the Site. Since the shredding/separating operation, and the motors-in motors-out operation under CIE/CIC was spread out across the entire Site, fluff and other dust from the shredding and grinding operations, and PCB and lead contaminated dust and dirt from the motors-in motors-out operation have become commingled with the PCB and lead contaminated soil associated with the past incineration operations of Standard Scrap Metal.

CIE/CIC conducts business on two parcels of property separated by Wells Street. The east lot is called the Main Yard and the west lot is called the West Yard. The entire West Yard, except for the truck scale, is unpaved. The Main Yard was partially paved. The area between B-2 through B-9 and G-2 through G-9 grids north of the Main Building was completely unpaved. (See Attached Map). An elevated concrete pad occupied the northeast corner of the Main Yard. The site is bounded on the north by railroad tracks, on the east by Pershing Road, on the west by Princeton Road, and on the south by businesses and residences. The site is located in a neighborhood which is considered to be a low income group area and is thus classified as an "environmental justice" site.

In February 1994, U.S. EPA tasked TAT to conduct a site assessment (SA) at the SSM/CIE site. The site was brought to the U.S. EPA's attention by IEPA after a preliminary site inspection was conducted confirming high levels of PCB and lead. During the SA, the U.S. EPA collected several soil, fluff, and metal pile samples, and found PCB concentrations ranging from 37.1 to 2,000 milligrams/kilogram (Mg/Kg) and lead ranging from 870 to 5,900 Mg/Kg. Toxicity characteristic leachate procedure (TCLP) results for lead ranged from 0.69 to 71 milligrams/liter (Mg/L). These documented concentrations encountered at the site presented a potential human health threat to the local population.

In October 1994, TAT, ERCS, and U.S. EPA conducted a site reconnaissance to plan a strategy for the removal action. The U.S. EPA also collected several samples of the stockpile materials and the soil. These results showed PCB, lead, and other heavy metal contamination.

The presence of PCBs, lead, and other heavy metal contamination in the soil, and the continuing release of fluff containing high concentrations of PCBs and lead from the grinding and shredding operations, and continuing release of PCB and lead contaminated dust and dirt from the motors-in motors-out operation posed a threat to human health and the environment and met the criteria for a time critical removal action as defined in the National Contingency Plan Section 300.415.

The threats are defined in the Unilateral Administrative Orders which were

issued to Steve Cohen, Lawrence Cohen, Chicago International Exporting, and Chicago International Chicago, Inc. and in the Action Memorandum signed by the Waste Management Division Director (currently known as the Superfund Division), U.S. EPA Region 5.

**2. Location of hazardous substance(s):** High levels of PCB and lead contamination were found in the surface soil and at depth throughout the site. Numerous soil piles and metal piles were sampled and found to contain high levels of PCB and lead. Particular areas of concern included the shredder area in Main Yard, pre and post shredder piles, the grinder area inside the building, bag-houses at the shredder and the grinder, and the soil and dust throughout the site. PCB concentrations as high as 2,700 Mg/Kg were found in surface soil samples, while the PCB concentrations in pre and post shredder piles were found up to 306 Mg/Kg. Fluff/soil piles in the Main Yard contained PCB concentrations up to 773 Mg/Kg PCBs and extraction procedure toxicity (EP TOX) lead concentrations of 49 Mg/L. The shredder and grinder operations were not equipped with air pollution or dust control equipment prior to the removal action and the fluff from these operations was continuously released to the site, to Wells Street, and into the neighborhood. The West Yard contained high levels of PCBs and Lead above the TSCA and RCRA clean up criteria as deep as eighteen feet below grade around the underground storage tank. Capacitor and transformer parts were observed throughout the West Yard and combustible liquids and water contaminated with PCB were encountered.

**3. Cause of the release or discharge:** U.S. EPA found three general sources of contamination at the Site:

- 1) Past and present operations associated with PCB and heavy metal contaminated soil and dirt included: dismantling large electric motors and transformers, dismantling and incineration of electric motors, dismantling of PCB transformers, and incineration of wire.
- 2) Shredding and grinding operations at the site under CIE/CIC caused releases of air borne contaminants and generated PCB and heavy metal contaminated fluff and dust. Large fluff piles existed on the site, and no known disposal records of this fluff are available such as TSCA or RCRA generator numbers or Hazardous Waste Manifests.
- 3) The motors-in motors-out operation conducted by CIE/CIC caused PCB and Lead contaminated dust and dirt to be released at the Site. Loads of electric motors, and pre-shredded material were found to contain varying amounts of PCB and Lead contaminated dust and dirt which was released at the Site upon arrival from suppliers of electric motors.

IEPA referred the site to the U.S. EPA, resulting in the February 1994 site assessment. The location of the site in a residential area, and the high concentration of contaminants, creates the potential for direct human contact which compounds the human health threats to the public and workers at the CIE/CIC site. The conditions at the site are consistent with the NCP, and thus a time critical removal action was initiated in November of 1994.

**4. Efforts to obtain response by responsible parties:** Chicago International Exporting, Chicago International Chicago, Inc., and Mr. Lawrence Cohen and Steven Cohen were issued a CERCLA Section 106 unilateral administrative order to undertake a full time critical removal action. In addition, an administrative access order to sample and to complete removal of contaminated material was enforced and a judicial order granting EPA access to the Site was entered by the U.S. District Court Northern District of Illinois. A second CERCLA Section 106 Unilateral Administrative Order was issued to CIE/CIC and Lawrence and Steven Cohen, to sample and eliminate releases of PCBs and lead from their scrap operation. The order also required the respondents to shut down operations if sampling confirmed that contaminated material was being released. PRPs have been identified by EPA and were issued CERCLA Section 104(e) Request for Information letters beginning in August 1995. Demand letters were issued to the PRPs on September 20, 1995 and May 17, 1996.

**B. Organization of the Response:** The site was divided into 25 feet square grids identified by an alphabet and a number. Initial site activities included clearing work areas and collecting pre-excavation soil samples from various depths to characterize the site contamination and aid in proper and economical disposal of wastes. Immediately after initial site activities, contaminated areas were identified and soil was excavated to varying depths depending on the contamination levels. The excavated soil was subsequently transported in rail-cars and disposed at the EnviroSAFE disposal facility in Idaho. The following outlines the agencies and contractors which provided response, assessment, or disposal assistance, and the action(s) each took or the role(s) each served.

Agencies/Parties Involved	Contacts	Title
U.S. EPA Region V	Steve Faryan	On-Scene Coordinator
U.S. EPA Region V	Kurt Lindland	Asst. Regional Counsel
Ecology and Envir.	Ragu Nagam Ron Bugg	Project Engineer Health and Safety Officer

Riedel Environ.	Dan Swanson	Response Manager
	Jeff Rhinefield	Response Manager

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**C. Injury/Possible Injury to Natural Resources**

**1. Content and time of notice to natural resource trustees:** All

correspondence including the action memorandum was copied and sent to the Natural Resource Trustee, Don Henne with the Department of the Interior. All required notifications and correspondence was conducted prior to the response efforts and updated weekly.

**2. Trustee damage assessment and restoration activities:** No trustee damage assessment or restoration activities were conducted at this site.

**D. Chronological Narrative of Removal Activities**

**1. Threat abatement actions taken:** A time critical removal action was conducted under the authority of CERCLA, Section 104(a). U.S. EPA Region 5 supported by TAT and ERCS conducted a site assessment in February 1994. Soil samples and stockpile samples of metals were collected for analyses and for waste disposal profiles. The following is a chronology of removal actions taken at the site. All costs incurred and actions taken by the U.S. EPA to conduct this time critical removal at the Site are not inconsistent with the NCP.

November 1994: EPA mobilized ERCS contractor RIEDEL, and TAT contractor Ecology and Environment on November 1, 1994. Warning signs were posted along the perimeter of the site and SDI Security Systems provided 24 hour security. EPA command post was established outside the site on Wells Street. Faerber Electrical, a subcontractor to RIEDEL, provided electrical services to the trailers and work areas while Commonwealth Edison provided the power to the site. Work areas were identified by caution tapes and the crew was briefed of the site safety measures. Work was initiated in the West Yard by removing all nonhazardous materials and shipping them off-site to a solid waste landfill. CIE/CIC trailers were moved out and the ERCS subcontractor Environmental Science and Engineering (ESE) mobilized and sectioned the site into 25 foot square grids. Each grid was identified by an alphabet and a number, with the grid's origin being the northwest corner of the West Yard. Excavation of contaminated material and confirmation sampling took place at each grid. During the first week of work, a bobcat, a track-loader and an excavator was mobilized. Several pre-excavation samples were collected from depths varying from 0-4 feet intervals using screw augers and excavators. Initial samples were sent to the E & E warehouse for PCB analyses on a quick turnaround basis. A spectrace 9000 x-ray fluorescence (Spectrace) instrument



was mobilized and used for detecting lead, cadmium, and other heavy metal contamination in the soil. Spectrace was used as a screening instrument in the initial stages of the project to determine the contamination depths of excavation. Each grid was systematically screened, and if concentrations above the removal action level were found, the area was marked for excavation. U.S. EPA evaluated the pre-excavation sample results and assigned depths up to which the contaminated soil needed to be excavated.

The removal action criteria for this site as set forth by EPA were 10 Mg/Kg PCB contamination based on Toxic Substances Control Act (TSCA) regulation and U.S. EPA's PCB Spill Cleanup Policy (40 CFR Part 761), 500 Mg/Kg total lead contamination (Superfund Lead Guidance Memorandum) and 5 Mg/L TCLP lead contamination in the soil based on Resource Conservation and Recovery Act (RCRA) regulations. Small capacitors, scrap metal, and small motors were encountered while excavating soil in the West Yard. The first 2-3 feet of soil usually was black stained, and was underlain by gray and brown sand.

TAT collected Gillian pump air samples for PCB and lead analyses from the Main Yard during shredder operations to evaluate action levels for ERCS activities. Personnel air monitoring for the ERCS crew was also conducted using Gillian pumps to evaluate any PCB and lead exposures.

Excavating of soil in the southern boundary of the West Yard uncovered three pipes. Soil in this vicinity was excavated up to 4.5 feet and appeared black/gray colored. These pipes were cut at the building's origin and plugged. Stockpile samples of steel, dirt, copper, and scrap were collected for characterizing the stockpiles in the Main Yard and helped in disposal. Samples were also collected from shredder reject piles, feed stock piles, copper fine piles, shredded steel, dirt under the conveyor, shredder bins, and from the grinder areas. The results of these samples were evaluated to aid in proper disposal.

Excavation of soil in grids E-2 through E-4 was conducted up to about 9 feet. A horizontal underground storage tank (UST) with approximate dimensions of 8 foot diameter and 27 feet in length was encountered in this area. This UST was almost full and contained low concentrations of flammable liquid. Air monitoring conducted with the photo ionization detector (PID) showed 50 - 200 parts per million organic vapors inside the tank. Samples of this UST liquid and water around the tank indicated low levels of PCB contamination and indicated that the liquid was combustible.

Excavated soil in the West Yard was segregated and consolidated into two

stockpiles; one stockpile containing PCB contaminated (TSCA group) soil and a second stockpile containing PCB and lead contaminated (Mixed group) soil. RCRA Regulations required stabilization of the Mixed group soil before disposal in a landfill. Disposal profile samples were collected from the TSCA group and from the Mixed group soil stockpiles and sent to various disposal facilities.

Each grid was excavated up to known depths of contamination based on pre-excavation sample results and then cleanup confirmation samples were collected. Each confirmation sample was collected by compositing 5 samples from that grid and comprised of 4 samples from 4 corners of the grid and one sample from the center of the grid. Confirmation samples of each grid were sent to the laboratory, while the five individual samples comprising that confirmation sample were held at the site. If the confirmation sample of a grid showed contamination above the removal action criteria, then the grid's five remaining individual samples were analyzed, and further excavation was conducted only in the contaminated part of the grid. After accumulating enough data, a correlation of confirmation sample results and the discoloration of the corresponding soil revealed that PCB contamination persisted in all black stained soils, while the gray discoloration of the soil showed PCB contamination consistent with the removal action criteria. Using this correlation, grids were then excavated to depths corresponding to the appearance of light gray colored soil and then confirmation samples were collected. Pre-excavation grid samples were taken periodically to verify the depths of contamination and to verify PCB concentrations of the discolored soil.

During the month of November, West Yard grids B-2, C-2, C-3, D-2, E-2, E-4, E-5, F-2, F-3, F-4, F-5, F-6, G-2, G-3, G-4, G-5, G-6, and G-7 were excavated and backfilled with tunnel stone. Excavated soil was stockpiled in the northern end of the West Yard pending disposal acceptance from disposal facilities.

December 1994: During this month, soil in the Main Yard was characterized by collecting soil samples. A jack hammer and compressor was used to bore through the concrete and cement pads of the Main Yard. A split sampler attached to a bobcat equipment was then used to collect samples from depths up to 4 feet. Pre-excavation samples were collected from B-11, B-16, C-18, D-14, E-2, E-6, E-12, F-11, F-14, F-18, G-15, H-19, I-14, J-12, L-12, N-19, and N-19 grids. Pre-excavation samples were also collected from the sidewalk of the Main Yard on Wells Street.

The OSC and ERCS coordinated disposal of hazardous waste soil, dust and debris. ENVIROSAFE disposal facility in Grandview, Idaho was selected to

accept hazardous waste material. Hazardous waste material was planned to be transported by rail-cars using CONRAIL as the primary transporter, Union Pacific Railroad as the secondary transporter, and Dart Trucking as the tertiary transporter. CONRAIL provided empty rail-cars, switched loaded rail-cars and transferred them to Union Pacific railroads. Union Pacific railroad transported hazardous waste material to ENVIROSAFE facility. Dart Trucking unloaded the rail-cars and transported the material to the landfill. Transportation by rail decreased the cost of the project by \$250,000 over the next lowest disposal bid.

Prior to filling the rail-car with hazardous waste material a liner was installed and all holes were patched with a quick dry sealant. After filling the railcar with required weight of contaminated material, the rail-car was covered with a tarp and secured with ropes. Hazardous waste placards were placed on the railcar and then the gondola cars were transported to ENVIROSAFE facility. The first shipment of hazardous waste from the project occurred on 12/9/94. Water accumulated in the excavated areas due to a low water table, and was pumped out and treated appropriately to facilitate the excavation operations. Fluff in hopper boxes under the hopper was sampled to characterize that material. This fluff is a waste product and includes dust from grinding and separation operations inside the Main Building, which collects in the hopper boxes. No filter bags were observed attached to the hopper boxes.

During this month, ERCS began clearing work areas in the northwest grids of Main Yard by moving scrap and other metal debris into areas east of the Main Building. Cooperation by CIE/CIC in aiding with yard clearing was sporadic and unreliable throughout the removal action.

The Breslube disposal facility in East Chicago, Indiana, was selected to accept UST contents and Ozinga Transporter was selected to transport the combustible liquid and water which collected in the excavation area. The first load of UST contents was shipped on 12/20/94. On 12/21/94, CIE/CIC picked up the UST removed by ERCS and moved it to the Main Yard. After removing the UST, ERCS excavated the former UST area down to 9 feet. Soil was visibly black and analytical data confirmed that PCB contamination still existed. An additional 4-6 feet of soil was excavated and the hole was dewatered. Confirmation samples were collected at this depth.

During the month of December, 17 railcar loads of hazardous waste soil, fluff and debris were shipped to ENVIROSAFE facility. About 8,500 gallons of flammable liquids from the excavation area was shipped to Breslube facility. D-2, D-3, and D-4 grids were excavated and backfilled, while area's E-2, E-3, and E-4 were excavated to 9 feet depths and confirmation samples were collected. Site activities were curtailed for Christmas in the last week of

December 1994.

January 1995: Work during this month included further excavation of soil in the former UST area of West Yard. The Spectrace instrument was demobilized after screening the West Yard. During this month, excavation of contaminated soil was initiated in the northwest corner of Main Yard. Excavated soil was stockpiled in the unexcavated area of Main Yard and was filled in the rail-cars as they arrived. The 13,600 gallons of PCB contaminated water which collected in the excavation pit was pumped into three tanker trucks and shipped to the Breslube disposal facility. Work areas in grids E-12 through E-14 was cleared by moving scrap and other debris. Excavation of contaminated soil occurred at grids B-3, B-4, B-9, B-10, B-11, C-3, C-4, C-10, C-11, D-7, D-10, and E-3. These areas were confirmed clean by sampling and were backfilled with tunnel stone.

High volume polyurethane foam (PUF) samplers were mobilized and air samples were collected using foam and filter cartridges and analyzed for PCBs. PUF sampling was initiated on 1/17/95 and samples were collected at the north, south, and east sides of the shredder. On 1/20/95, CIE/CIC installed a cyclone particulate separator to the grinder operation's air discharge at the northern end of the Main Building. By the end of the month, CIE/CIC removed the cyclone hopper and blower and informed U.S. EPA that they will be installing a better and more effective bag-house. During this month, TAT conducted a real time aerosol (RAM) monitoring for fugitive dust emissions.

During this month pre-excavation sampling was conducted at B-9, C-9, D-9, D-16, and D-18 grids and on the Wells Street fence line of Main Yard at B-9, C-9, and D-9 grid positions. Excavation of contaminated soil occurred at grids B-3, B-4, B-9 (fence line), B-10, B-11, C-3, C-4, C-10, C-11, D-10, D-11, and E-3. A total of 30 rail-cars was shipped out with hazardous waste material to ENVIROSAFE during this month.

February 1995: A contamination depth profile based on pre and post excavation sample results of Main Yard was evaluated and determined that contamination in most of the Main Yard persisted only up to 3 foot depths. Therefore, excavation was conducted up to 3 foot depths and confirmation samples were then collected. The area between the concrete high pad and the northern boundary of the Main Yard, extending between B and C nodes of grids 15 through the eastern fence was excavated using track-loader and the excavator. This area was about 5 feet deep and contained bricks, ash, debris, scrap, and other metals. Removing soil and other metal debris from grid areas B-13 through B-15 revealed an underlying cement slab extending between B-13 and the high concrete pad at B-15 grid.

ERCS continued with filling the rail-cars with the material from the soil/fluff pile and CIE/CIC moved metal and other salvageable materials out of the work areas of the Main Yard. ERCS also moved scrap metal from north of the rail-tracks to the east side of the Main Building to facilitate excavation operations. C-16 through C-19 grids on the high pad was cleared out of all the soil and other debris to collect core samples. Core samples were collected from C-16, C-17, C-18, and C-19 grid nodes. Grids E-6 and E-7 were excavated in West Yard. Soil was also excavated on either side of the fence line at D-7, D-8, E-7, and E-8 grids of West Yard, and at C-9, D-9, E-9, G-9, and H-9 grids of Main Yard. Soil samples were also collected from railroad tracks in the West Yard at grids C-2 to characterize the soil in the track area. This sample result showed 93 Mg/Kg PCBs at 1 foot depth and 36.6 Mg/Kg PCBs at 2 foot depths. A g-14 sample collected from the railroad tracks in the Main Yard showed 80 Mg/Kg PCBs at 1 foot depth and 17.8 Mg/Kg PCBs at 2 foot depths. Sample E6 was collected from the rail track at E-6 grid and indicated 497 Mg/Kg PCBs at 1 foot depth.

During this month, air monitoring was continued using PUF samplers. Excavation of contaminated soil occurred at grids B-5, B-6, B-7, B-12, B-13, C-5, C-6, C-7, C-12, C-13, C-14, C-15, D-5, D-6, D-7, D7-Fence, D-12, D-13, E-6, E-7, G-9, G-10, G-11, and G-12. A total of 31 rail-cars containing hazardous waste material was shipped to ENVIROSAFE during this month.

March 1995: During March, part of the rail-track in the West Yard had to be repaired to continue transportation by rail-cars. On 3/3/95, CIE installed new bag-houses for the shredder and grinder operations. Samples were collected along the railroad track wall at F-13 and F-14 grids of Main Yard. Samples were also collected from the sidewalk on the west side of Main Building at I-8, I-9, J-9, K-9, and L-9 grid points.

On 3/13/95, the shredder emissions increased, and U.S. EPA began emission tests. However, CIE/CIC stopped shredding operations whenever U.S. EPA attempted to conduct visible emission readings. Samples of the shredder stockpiles, copper fine pile, copper scrap, and the shredded scrap steel on the high pad were collected. The northwest fence of the Main Yard was removed to excavate underneath it. A fence subcontractor repaired the broken part of the fence and also replaced the main gate of the Main Yard. The area between the northern boundary of the site and the high pad between B-C grids 15 through 20 was excavated. CIE/CIC then paved this area with a concrete pad and raised it to the level of the high pad. The cleanup inside the Main Building was initiated on 3/24/95. Soil and other debris on the floor was removed, while the fluff material on the beams and walls was vacuumed. A high efficiency particulate adsorbent (HEPA) vacuum cleaner was used so as not to release any PCB or

lead dust during vacuuming. Two-man lifts were used to reach high places. ERCS cut large metal pieces and helped CIE/CIC in moving out Scrap and other materials from inside the building. ERCS also assisted CIE/CIC by moving scrap piles to the south of the shredder. CIE/CIC installed a concrete slab over the grids G-14 through G-16 after EPA excavated areas. ERCS cleared the trenches inside the Main Building. These trenches contained PCB and lead contaminated fluff and metal debris which required chiseling to loosen the dirt before removing it.

During this month, grids E-10, E-11, E-12, E-13, F-9, F-10, F-11, F-12, F-13, F-14, F-15, F-16, G-13, G-15, and G-16 were excavated. During this month a total of 23 railcar loads of contaminated material was shipped to ENVIROSAFE disposal facility. Work during this month was slowed down due to CIE/CIC not making available new work areas on the east side of the shredder.

April 1995: In April, ERCS completed vacuuming the grinder area and completed cleaning the trenches. A sample from the trench before the cleanup showed 290 Mg/Kg PCBs. The Main building was decontaminated during this month. The fluff material which is generated from grinding operations has shown high concentrations of PCBs and lead. The installation of the first blower and cyclone separator on the copper chopping/separation system caused the PCB and lead contaminated dust to be released into the work areas of the scrap yard exposing personnel and contaminating the building and across the property. Samples collected from the copper fine pile inside the building showed 78 Mg/Kg PCBs. On 4/4/95, CIE/CIC shipped out the copper fine pile in a 40 foot shipping container. Samples collected from the container while it was being loaded with the copper fine material showed 29 Mg/Kg PCBs. CIE/CIC declined to provide information as to the destination of that container.

After decontaminating the Main Building, man lifts, air compressor and chisel units were demobilized. Crew then began operations on the east side of the shredder. ERCS had to assist CIE/CIC in moving metal and debris piles from the high pad and helped in sorting out metal from other piles at I,J,K 12 through 19 grids.

On 4/10/95, U.S. EPA attended a meeting with CIE/CIC and its contractor SUNEKO to discuss the work plan required to be prepared as per the Unilateral Administrative Order (UAO) issued in February 1995 regarding the ongoing operations of the scrap operation. One week later CIE/CIC verbally told U.S. EPA that SUNEKO would not conduct the sampling work and that International Engineers would be the contractor for air and waste sampling required under the UAO. The UAO required CIE/CIC to conduct air sampling and to sample the inlet and outlet process streams and to cease operations which were causing

releases.

Beginning on 4/10/95, ERCS started the work of removing steel, soil, and the debris pile using a track-loader. This material was filled in the rail-cars for disposal. Nonhazardous piles from the northeast corner of the high pad and from the eastern boundary of the high pad were moved out and transferred to I, J, 17 and 18 grids. A nonferrous metal and dirt pile was removed from the high pad and transferred to rail-cars for disposal. CIE/CIC informed U.S. EPA that they were unable to sort out metal from this pile. Several boxes of fluff resulting from grinding and shredding operations were stored in cardboard boxes and kept by the shredder and were exposed to rain. PUF air samplers were demobilized on 4/18/95 since CIE/CIC stopped using the shredder. Several samples of the stockpiles in grids I-19, L-19, K-15, K-16, K-17, K-18, and M-17 were collected to classify waste for disposal.

The area between the shredder and Main Building is mostly paved with concrete and asphalt. There were at least 3 locations in this area that did not have asphalt. These areas were sampled up to 3 feet depths for characterizing the soil. All dirt piles south of the shredder by the incinerator were also moved and transferred into the rail-cars. On 4/25/95, shredder bag-house material caught fire when CIE/CIC emptied the bag-house and a hot metal plate fell on the material.

A brusher attachment was mobilized and used with the bobcat to sweep asphalt and concrete areas east of the building. This material was transferred into the rail-cars. A poly tank was mobilized and the rain water collected in the excavated areas of Main Yard was pumped into the tank. A total of 17 railcar loads of contaminated waste was shipped to ENVIROSAFE during this month. Part of the high pad was decontaminated during this month.

CIE/CIC paved concrete over grid area's E-12, E-13, E-14, E-15, E-16, F-12, F-13, F-14, F-15, F-16, G-12, G-13, G-14, G-15, and G-16 after the grids were backfilled with tunnel stone.

May 1995: During this month, work in the Main Yard continued. The asphalt paved area immediately east of the building was scraped and brushed with bobcat equipment. Grid areas south of the shredder at K and L 14, 15, and 16 were excavated up to 3 feet and backfilled with tunnel stone after meeting the removal action criteria.

A soil debris pile at K-17, J-19, and G-19 grids was transferred into rail-cars. After clearing up stockpiles immediately south of the high pad, the ramp at G-18 grid connecting the high pad was observed to be made up of dirt, motors,

and scrap metal. Between G-17, G-18, and G-19 grids and the asphalt south of it, about 11.5 feet of unpaved area existed. This area was excavated to the base of the pad and backfilled. Pre-excavation samples were collected at L-17, G-18, and E-19 grids to characterize the wastes and to determine the depths of contamination. The rail spur between J-19 grid node and H-17 grid was removed and excavated up to 3 feet after a pre-excavation sample result showed PCB contamination. The unpaved area at the eastern fence of the Main Yard was also sampled. This resulted in the excavation of L-20 grid by the fence.

From 5/9/95, ERCS began removing soil, metal, fluff and debris around the shredder. The material around the shredder had to be shoveled and removed. Most of the material was bounded to the shredder and proved hard to remove manually. A vacuum with high power capacity was mobilized through National Industrial Maintenance Company on 5/10/95 and used to vacuum the material bounded to the shredder. After 2 days of work, this equipment was demobilized because the scrap pieces vacuumed with the dirt were blocking the hose and hindering the vacuuming process. After this, the ERCS manually cleaned the area around the shredder. Metal fluff and debris under the conveyors, shaker, and the feed area were removed manually. The EPA's TSCA enforcement branch visited the site on 5/11/95 and collected fluff samples from cardboard boxes and copper fine samples from the pile inside the Main Building.

On 5/15/95, CIE/CIC moved 2 metal piles from the high pad into J-18 and 19 grid areas so that EPA could start decontamination of the high pad. CIE/CIC moved the stockpile at D-17 grid on the high pad and consolidated it with the metal pile at the northeast corner of the high pad. This material appeared to be fluff and dust and resulted in rust colored dust while consolidating the pile. Three pits were observed in the high pad after moving all but one stockpile of material. The pit north of F-19 grid was 8.5 feet wide and 6 feet long, the pit at D-18 grid was square measuring 15.75 feet in each dimension, and the pit at C-15 grid measured 6 feet wide and 5 feet in length. All these pits were filled with soil, fluff, and metal debris. These pits were excavated up to the concrete slab underneath them and backfilled with tunnel stone. On 5/19/95, CIE/CIC's activities resulted in the breakage of a cardboard box containing fluff from the hopper. The fluff was spilled onto the ground at the shredder and ERCS cleaned up the area. By 5/19/95, the concrete slab under the shredder was cleaned. Bag-house activities of CIE/CIC resulted in spreading fluff on the concrete pad on 5/22/95. Samples collected from this material showed 440 Mg/Kg PCBs. The concrete slab under the shredder was cleaned once again due to the previously mentioned spill.

Crew began scrapping and brushing operations of the high pad on 5/24/95. The



high pad was scraped with bobcat and front-end loaders to remove hardened soil on the pad. After this, the bobcat with the brush attachment was used to brush the pad. Finally the pad was decontaminated using water.

Starting on 5/25/95, ERCS began removing the rail line in the Main Yard at H-15 grid. After removing the rail line in the Main Yard, contaminated soil was excavated and backfilled with the tunnel stone. Several boxes of fluff generated by CIE/CIC were sampled by EPA before loading them into the rail-cars for disposal. Excavating under the conveyor at G-16 grid, uncovered PCB and Lead contaminated soil and battery casings. Evaluation of the results of samples collected at G-17 and around the shredder indicated high concentrations of PCBs and lead. U.S. EPA allowed CIE/CIC to encapsulate the area around the shredder with a concrete slab provided a deed restriction would be entered indicating the contamination existed and restricting property use to industrial only.

During this month, 4 rail-cars containing hazardous waste material were shipped to ENVIROSAFE facility.

June 1995: The crew removed the rail lines of the Main Yard and West Yard, excavated the contaminated soil, and backfilled it with tunnel stone. Grid area H-15, used for storing and stockpiling soil, was excavated to about 2 feet depth. Track Services, subcontractor to ERCS, was mobilized and the rail tracks were replaced with new rails. On 6/2/95, EPA attended a meeting with CIE/CIC and their contractor International Engineers and discussed their draft work plan and operation plans prepared as per the February UAO. During this month, all the support areas and decontamination areas were dismantled and demobilized. EPA collected a sample of the dirt on the new cement pad laid down at E-6 grid by CIE/CIC and being used for staging scrap metal procured from other vendors. This sample result indicated 190 Mg/kg PCBs and lower concentrations of lead. A follow up meeting with CIE/CIC and International Engineers took place on 6/8/95 to review the EPA's comments.

An empty roll-off box was mobilized on 6/12/95 and the rail track removed from the site was shipped to a metal recycler. All site activities were completed on 6/16/95. All equipment, office trailer, ERCS trailer, break trailer, decontamination trailer, and the guard trailer were demobilized. Power to the site was disconnected on 6/19/95. One of the earlier rail-cars shipped out from the site was determined by Union Pacific in St. Louis, Missouri, to be over the allowed weight limit. This excess soil was transferred into the last railcar of the project on 6/19/95 by ERCS crew in St. Louis, Missouri. During the month of June, 8 railcar loads of hazardous waste soil was shipped to ENVIROSAFE disposal facility.

U.S. EPA and ERCS returned to the site on January 16, 1996 to remove the PCB contaminated copper fines located on the concrete pad at the North end of the site. Six additional rail cars were lined, loaded and tarped and shipped to Envirosafe Services in Grand View Idaho for stabilization and disposal. This final phase of the removal action was completed on January 30, 1996. All equipment was decontaminated and demobilized.

A total of 136 rail-cars containing hazardous waste material was shipped to ENVIROSAFE disposal facility by the end of this removal action.

July through October 1995:

Pursuant to the February 1995 UAO, PRP contractor International Engineers conducted three rounds of sampling of the shredder pickings, copper scrap material, copper fine material, chopper line's separator table fluff, Bag-House fluff, Shredder line's fluff, and shredded scrap steel. Three rounds of air sampling was conducted by International Engineers as required by the UAO. Analytical results of the Bag-House fluff material of both the shredder and the chopper line showed elevated levels of PCBs, while the fluff material of the Chopper line's separator table showed PCB and TCLP lead contamination. International Engineers also prepared and implemented the Work Plan and the Operation Plan as required by the UAO.

During the month of October 1995, U.S. EPA inspected the site at the request of the PRP to verify compliance with the UAO. Fluff generated from day-to-day operations has been collected in plastic lined cardboard boxes, labeled appropriately, and stored inside a metal container. The Bag-House fluff resulting from grinding operations is now collected in a plastic lined cardboard box with the help of a screw-auger to minimize emissions to the atmosphere. A small metal container has been fabricated and used to collect copper fine and fluff material coming out of one of the side conveyors. This fabricated container is designed to minimize fluff emissions to the atmosphere. A similar fabricated container is also being utilized at the fluff material outlet of the side conveyor. The area around the shredder and the high pad has been observed to be swept clean. Inside the building, the grinding operation area has also been swept clean. Air purifying respirators were observed inside the building. CIE/CIC indicated that they will allocate clean up days to periodically sweep and clean the operating areas of the site which is designed to collect all contaminated dust and dirt on the ground from the motors-in motors-out, shredding, and grinding operations. CIE/CIC has also indicated to U.S. EPA that it no longer intends to operate the shredding and grinding operation and that it intends to sell that equipment. According to CIE/CIC, its future operation at the Site will consist solely of the motors-in motors-out operation.

**2. Treatment, disposal, or alternative technology approaches pursued:** On-site waste material was classified into two waste groups. A TSCA group soil regulated by TSCA and a Mixed group containing TSCA and RCRA waste regulated by both TSCA and RCRA. The TSCA regulated soil was directly land filled in a TSCA approved landfill, while the Mixed group soil was stabilized at the disposal facility prior to land filling. A total of 136 rail-cars containing approximately 12,487.66 tons of hazardous waste was shipped to the ENVIROSAFE facility in Grandview, Idaho. 13,000 gallons of flammable liquids and contaminated water were disposed of at Breslube facility in East Chicago, Indiana. The flammable liquid was used for fuel blending. Table 1-1 and 1-2 summarize the waste disposed by U.S. EPA during the removal action.

**3. Public information and community relations activities:** A community relations plan was implemented by the OSC and by U.S. EPA Office of Public Affairs. Door to Door information was distributed by the OSC and the Administrative Record was established at the U.S. EPA office at 77 W. Jackson in Chicago and at a local library for Citizen review.

**E. Resources Committed:** The total removal project ceiling for ERCS was \$3,150,000. Cost incurred under ERCS at the completion of the project is \$2,933,185.41. The TAT ceiling for the project was \$175,000, and the cost incurred by TAT at the completion of the project is 158,437.91\$. The ceiling for U.S. EPA was \$50,000 and the costs incurred by the completion of the project is \$24,754.69.

#### REMOVAL PROJECT ESTIMATED TOTAL COST SUMMARY

##### Extramural Costs:

Total Cleanup	
Contractor Costs	\$2,933,185.41
Total TAT/START Costs	\$158,437.91
Total CLP	00.00
Total REAC Costs	00.00

<b>EXTRAMURAL SUBTOTAL:</b>	<b>\$3,091,623.32</b>
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##### Intramural Costs:

EPA Direct Costs	\$24,754.69
EPA Indirect Costs	\$13,568.00

<b>INTRAMURAL SUBTOTAL</b>	<b>38,322.69</b>
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<b>ESTIMATED TOTAL PROJECT COSTS</b>	<b>\$3,129,946.01</b>
<b>PROJECT CEILING</b>	<b>\$4,100,000.00</b>

**Please Note: These costs are an estimate only and may be significantly underestimated. These costs may change and will be updated as the invoices and time sheets are compiled.**

## **II. EFFECTIVENESS OF REMOVAL ACTIONS**

**A. Actions Taken by PRPs:** CIE/CIC and Steven and Lawrence Cohen failed to comply with the unilateral administrative order issued in September 1994 requiring them to conduct the removal action.

In the initial stages of the removal action, CIE/CIC and the Cohens failed to comply with an administrative order for access by denying access to the Southern half of the Main Yard. U.S. EPA responded by gaining access for site activities through a court order. CIE/CIC complied with the February 1995 Unilateral Administrative Order (UAO) to conduct sampling of the raw material and the end products, provide health and safety training to the employees, and conduct air monitoring to determine exposure hazards, and prepare and implement an Operation Plan to address releases of hazardous substances from their Site. CIE/CIC paved all excavated areas with concrete or asphalt. Safety Training was provided to all CIE/CIC employees as was the implementation of the Operational Plan. As of the completion of this project, CIE/CIC discontinued the shredding of electric motors and separation of the copper. In addition, CIE/CIC disposed of the two container boxes of PCB contaminated fluff and the fluff contaminated with PCB and lead at an authorized disposal facility.

**B. Actions by State and Local Agencies:** The City of Chicago's Department of Environment provided background information and the Illinois Environmental Protection Agency (IEPA) provided with information on previous sampling at the site. The IEPA conducted a preliminary site inspection of the facility and confirmed high levels of PCB and lead in the soil. The IEPA then referred the site to the U.S. EPA Emergency Response Branch for a time critical removal action.

**C. Actions Taken by Federal Agencies and Special Teams:** No other federal agencies were involved in the removal action.

**D. Actions Taken by Contractors, Private Groups, and Volunteers:**

The EPA ERCS contractor Riedel Environmental Services, performed the cleanup of the site. ERCS excavated contaminated areas, decontaminated shredder and office building, coordinated the shipment and disposal of wastes. Through the ERCS contractor, site security, utilities support, and equipment was also provided.

All ARARs were complied with to the extent practicable during this removal activity.

The U.S. EPA technical assistance team contractor, Ecology and Environment, Inc., provided timely assistance in conducting the extent of contamination study by providing fast gas chromatography analysis, the development and maintenance of Quality Assurance Sampling Plan for Environmental Response (QASPER), documentation of on-site activities, assisting in waste categorization, air quality monitoring, cleanup confirmation sampling, reviewing and commenting on PRP's Work Plan and Safety Plan, and over viewing PRP sampling.

### **III. DIFFICULTIES ENCOUNTERED**

#### **A. Items That Affected the Response:**

- **Theft:** Theft occurred at least 2 times at the site in spite of site security. Since PRP operations continued even during removal action, it was difficult to distinguish between PRP workers and any other person entering the site.
- **Threats:** Site security had some trespassers arrested while trying to enter the site. However, after their release, they came back to the site and physically threatened the security guard, who was an off-duty police officer.

#### **B. Issues of Intergovernmental Coordination:**

NONE

#### **C. Difficulties Interpreting, Complying With, or Implementing Policies and Regulations:**

NONE

### **IV. RECOMMENDATIONS**

#### **A. Means to Prevent a Recurrence of the Discharge or Release:**

- **Emission Controls:** Federal or the State Agency should continue to enforce emission control under the Clean Air Act at this and other scrap

yards and auto yards, where scrapping/crushing and shredding of electric motors occurs. Scrap yards which generate these wastes need to sample and dispose of the waste streams in compliance with state and federal disposal laws. Without emission control devices, the fluff generated from scrap yards and auto salvage yards will be released to the air and soil resulting in contamination of those yards.

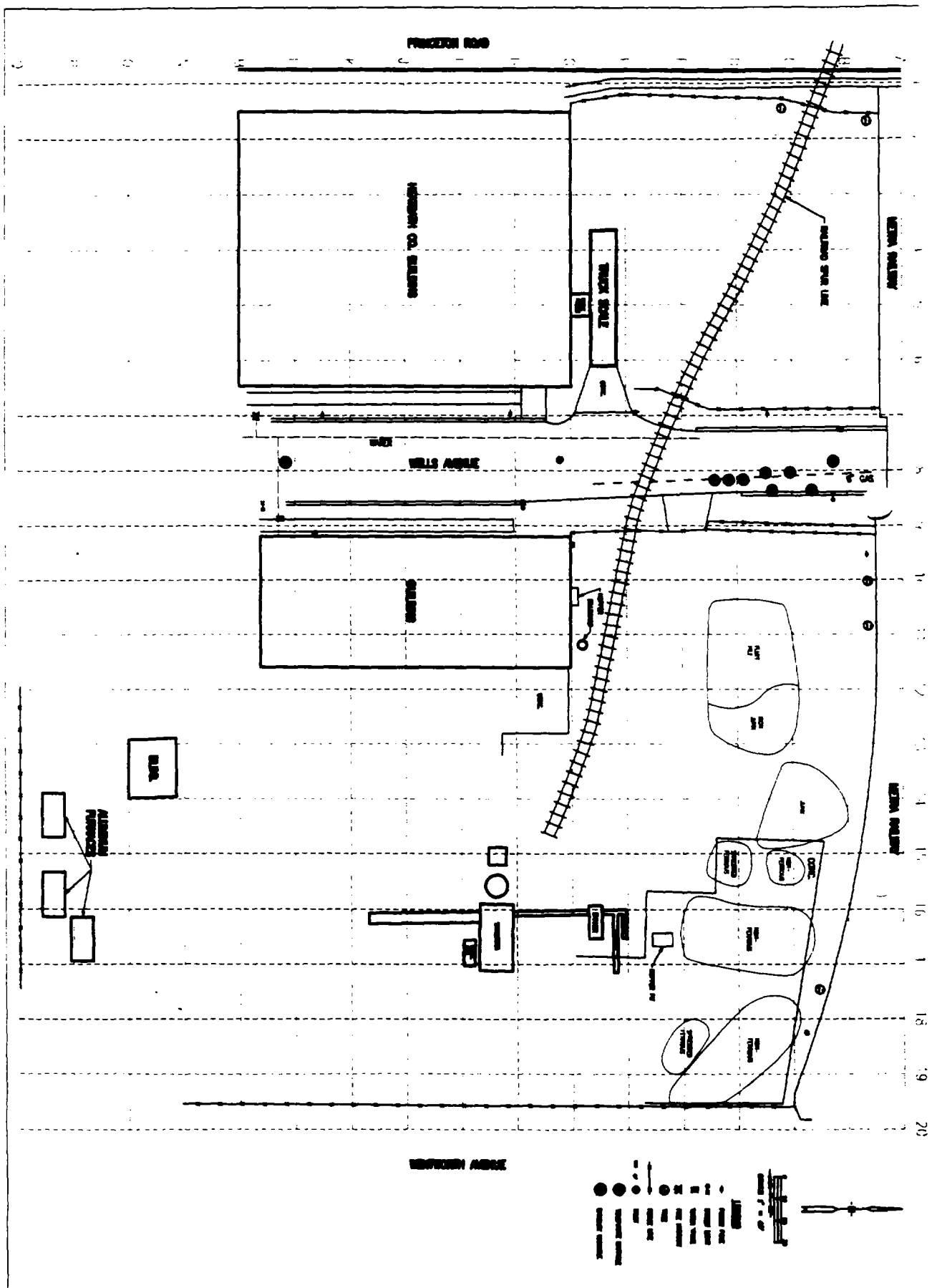
- **Awareness:** Most scrap yards and auto salvage yards have been conducting business for a long time. The operators of the yards need to be educated about potential PCB and lead contamination in their materials so that they prepare a health and safety plan and an operation plan to control releases of hazardous materials from day to day operations.
- **Containment Areas:** Scrap yards and auto salvage yards which shred, crush, and grind electric motors containing PCB and lead contaminated materials should have concrete containment areas and proper air pollution control equipment to prevent releases of contaminated materials from their day to day operations.

**B. Means to Improve Removal Activities:**

- The use of the Spectrace 9000 XRF instrument to screen site soil for metal contamination speeds up excavation and reduces analytical costs. Analytical costs will be saved when confirmation samples are collected based on Spectrace 9000 XRF instrument readings.
- Screening for PCBs at the E & E warehouse expedited the removal process. This aided in uninterrupted excavation of contaminated soil, especially in the initial stages of the removal action.

**C. Recommendations for New Policy or Regulations, and Changes in Current Regulations and Response Plans :**

NONE



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CHICAGO IL

**Environmental Science & Engineering, Inc.**  
5901 N. ELSTON RD.  
PEORIA, ILLINOIS 61615  
(309) 692-4122

**PROJECT**

**CLIENT**

**DATE**

**BY**

**FOR**

**REVISIONS**

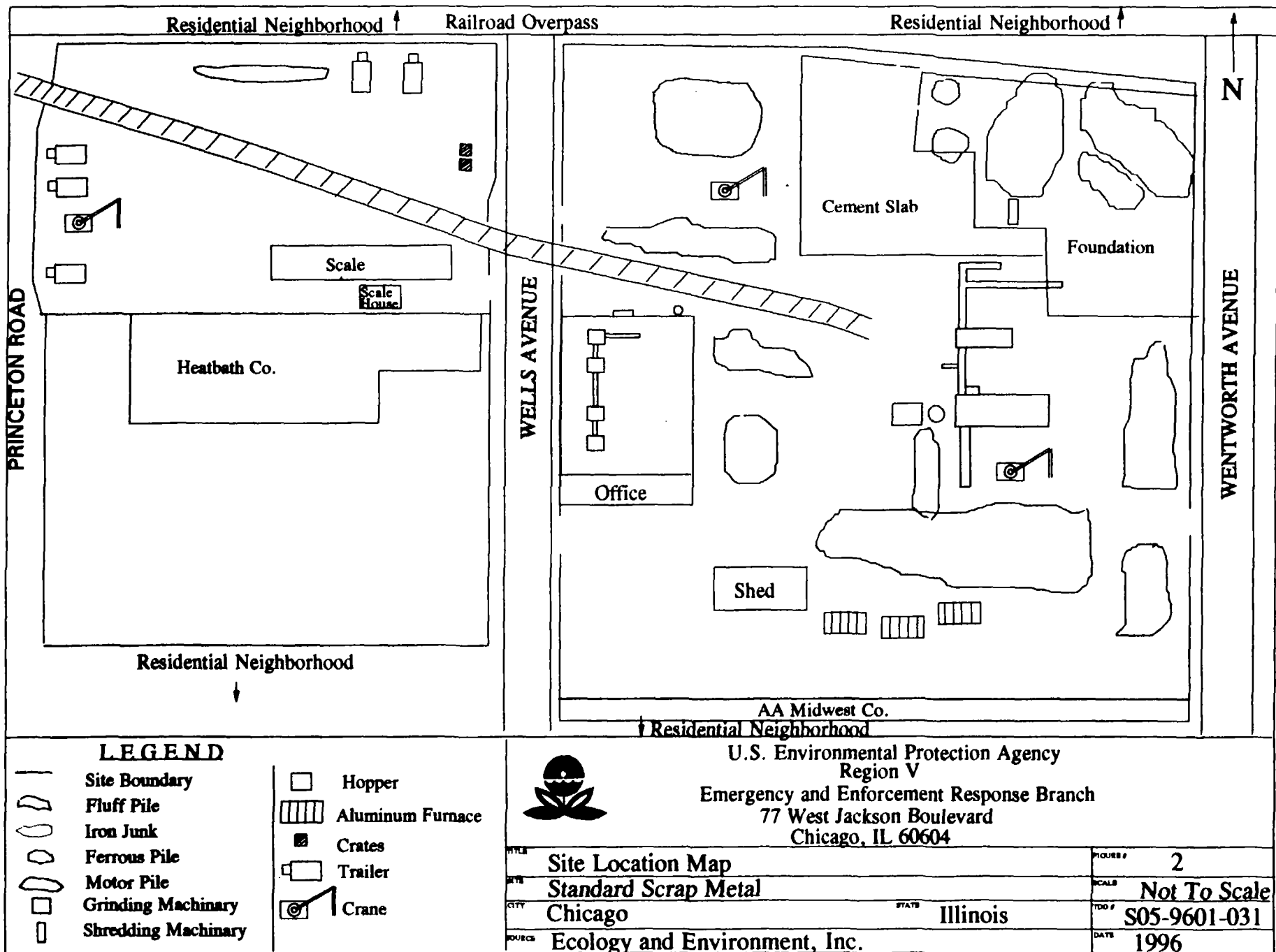
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**BY**

**FOR**

**REVISIONS**





**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	94,000	12/09/94	IL 6383601	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	80,903	12/09/94	IL 6383603	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	61,498	12/09/94	IL 6383614	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,670	12/12/94	IL 6383615	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	82,830	12/12/94	IL 6383605	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	58,200	12/12/94	IL 6383606	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,555	12/14/94	IL 6383607	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	89,526	12/14/94	IL 6383608	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	71,359	12/14/94	IL 6383617	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,106	12/15/94	IL 6383621	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,379	12/15/94	IL 6383622	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	72,928	12/16/94	IL 6383623	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	93,576	12/16/94	IL 6383618	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	90,260	12/16/94	IL 6383619	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	91,128	12/19/94	IL 6383620	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,036	12/19/94	IL 6383624	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	78,024	12/19/94	IL 6383625	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	95,272	01/05/95	IL 6383626	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	82,435	01/05/95	IL 6383627	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,584	01/05/95	IL 6383628	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	74,638	01/05/95	IL 6383643	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	91,849	01/09/95	IL 638630	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	78,465	01/09/95	IL 6383631	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,659	01/09/95	IL 6383632	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,952	01/10/95	IL 6383633	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	87,153	01/11/95	IL 6383634	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,830	01/11/95	IL 6383635	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	83,273	01/17/95	IL 6383636	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,076	01/18/95	IL 6383637	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	89,556	01/18/95	IL 6383638	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	90,432	01/18/95	IL 6383639	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	82,047	01/18/95	IL 6383640	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	77,723	01/18/95	IL 6383641	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	85,189	01/23/95	IL 6383644	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	69,276	01/24/95	IL 6383642	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	91,063	01/24/95	IL 6383602	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	71,237.00	01/24/95	IL 6383645	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	83,112.00	01/24/95	IL 6383646	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	74,616.00	01/25/95	IL 6383647	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	90,555.00	01/26/95	IL 6383648	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,277.00	01/26/95	IL 6383649	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	88,126.00	01/27/95	IL 6383650	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	85,915	01/27/95	IL 6383651	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	84,285	01/28/95	IL 6383652	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	80,851	01/28/95	IL 6383653	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	77,695	01/31/95	IL 6383655	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	87,082	01/31/95	IL 6383656	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	69,663.00	02/01/95	IL 6383654	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho



**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,293.00	02/01/95	IL 6383657	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,269.00	02/03/95	IL 6383658	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	76,135.00	02/03/95	IL 6383659	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	70,402.00	02/04/95	IL 6383660	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,548.00	02/04/95	IL 6383661	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	82,349	02/06/95	IL 6383662	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,307	02/06/95	IL 6383663	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	74,804	02/06/95	IL 6383664	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	70,375	02/06/95	IL 6383665	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	69,939.00	02/07/95	IL 6383666	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,363 estimated	02/07/95	IL 6383667	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	85,089.00	02/09/95	IL 6383668	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	78,283.00	02/09/95	IL 6383669	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,474.00	02/10/95	IL 6383670	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	88,847.00	02/10/95	IL 6383671	Stabilization and Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	80,895.00	02/13/95	IL 6383672	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	82,585	02/13/95	IL 6383673	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	67,522.00	02/14/95	IL 6383675	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	76,973.00	02/14/95	IL 6383674	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	77,247	02/15/95	IL 6383678	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	78,081.00	02/15/95	IL 6383676	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	80,798.00	02/16/95	IL 6383677	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	78,637	02/16/95	IL 6383684	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,615.00	02/23/95	IL 6383682	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	89,194.00	02/23/95	IL 6383683	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,990	02/24/95	IL 6383679	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,486.00	02/24/95	IL 6383680	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	68,906.00	02/27/95	IL 6383681	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,251	02/27/95	IL 6383685	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	85,940.00	02/28/95	IL 6383686	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,363 estimate	03/02/95	IL 6383687	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,363 estimate	03/02/95	IL 6383688	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,363.00	03/03/95	IL 6383689	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86.363.0	03/03/95	IL 6383690	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	74,295	03/06/95	IL 6383691	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	89,386.00	03/07/95	IL 6383693	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	91,427.00	03/07/95	IL 6383694	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	92,428	03/08/95	IL 6383695	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	91,678.00	02/08/95	IL 6383696	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	89,306.00	03/09/95	IL 6383697	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	87,186	03/10/95	IL 6383698	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	84,760.00	03/10/95	IL 6383699	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	90,555.00	03/13/95	IL 6383700	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	90,618	03/13/95	IL 6383701	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	94,723.00	03/14/95	IL 6383702	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,923.00	03/15/95	IL 6383703	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	77,604	03/17/95	IL 6383704	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	70,744.00	03/16/95	IL 6383707	Landfill	Envirosafe Services of Idaho, Grandview, Idaho



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**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,641.00	03/21/95	IL 6383708	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	77,598	03/21/95	IL 6383709	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	79,071.00	03/23/95	IL 6383711	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	79,838.00	03/23/95	IL 6383710	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	59,701.00	03/24/95	IL 6383717	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	69,989.00	04/11/95	IL 6383712	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	76,881.00	04/13/95	IL 6383713	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	77,489.00	04/17/95	IL 6383725	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	65,245.00	04/19/95	IL 6383715	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	68,641.00	04/20/95	IL 6383714	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	58,859.00	04/25/95	IL 6383716	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	79,622.00	04/27/95	IL 6383726	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

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**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	79,184.00	05/03/95	IL 6383727	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	85,470.00	05/04/95	IL 6383728	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	80,084.00	05/08/95	IL 6383729	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	75,670.00	05/08/95	IL 6383730	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	88,589.00	05/09/95	IL 6383732	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	81,150.00	05/09/95	IL 6383731	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	105,104.00	05/09/95	IL 6383733	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	84,903.00	05/12/95	IL 6383734	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,112.00	05/12/95	IL 6383735	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	80,274.00	05/18/95	IL 6383736	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	90,129.00	05/18/95	IL 6383737	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	84,987.00	05/25/95	IL 6383738	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	82,919.00	05/26/95	IL 6383739	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	68,926.00	05/26/95	IL 6383740	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,198.00	06/01/95	IL 6383746	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	75,625.00	06/01/95	IL 6383747	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	55,071.00	06/02/95	IL 6383745	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	71,411.00	06/06/95	IL 6383744	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	73,956.00	06/07/95	IL 6383743	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	76,798.00	06/09/95	IL 6383742	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	69,150.00	06/09/95	IL 6383741	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	40,758.00	06/12/95	IL 6383720	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	67,159.00	01/22/96	IL 3923028	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	72,947.00	01/22/96	IL 3923025	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**Table 1**  
**HAZARDOUS WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Kilos)	Date Shipped	Manifest#	Disposal Method	Facility, Location
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	70,906.00	01/23/96	IL 3923026	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	86,363.00	01/23/96	IL 3923033	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	56,282.00	01/30/96	IL 6938421	Landfill	Envirosafe Services of Idaho, Grandview, Idaho
RQ Polychlorinated biphenyl mixture, UN 2315, PGII (PCB) (Lead) (Cadmium)	58,214.00	01/30/96	IL 6938422	Landfill	Envirosafe Services of Idaho, Grandview, Idaho

**TABLE 2**  
**LIQUID WASTE DISPOSAL TABLE**  
**U.S. EPA STANDARD SCRAP METAL**  
**CHICAGO, ILLINOIS**

Waste Category	Quantity (Gallons)	Date Shipped	IL Manifest #	Disposal Method	Facility, Location
Waste Oil and Water Mixture (Non-USDOT Hazardous Material)	5,500	12/20/94	IL 6519621	Recycle	Breslube, East Chicago, IN
Waste Oil and Water Mixture (Non-USDOT Hazardous Material)	3,000	12/21/94	IL 6519622	Recycle	Breslube, East Chicago, IN
Waste Oil and Water Mixture (Non-USDOT Hazardous Material)	5,500	01/07/95	IL 6519574	Recycle	Breslube, East Chicago, IN
Waste Oil and Water Mixture (Non-USDOT Hazardous Material)	5,100	01/07/95	IL 6519576	Recycle	Breslube, East Chicago, IN
Waste Oil and Water Mixture (Non-USDOT Hazardous Material)	1,500	01/07/95	IL 6519575	Recycle	Breslube, East Chicago, IN



**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
			ARSENIC TOTAL/TCLP	CADMIUM TOTAL/TCLP	CHROMIUM TOTAL/TCLP	LEAD TOTAL/TCLP	PCBS TOTAL
11/02/94	WYB2-1	B-2 Grid @ 1 foot	14.2	21.3	67.5	52.1	182.8
11/02/94	WYB2-1	B-2 Grid @ 1 foot	NA	NA	NA	NA	40*
11/02/94	WYB2-2	B-2 Grid @ 2 feet	NA	NA	NA	NA	ND*
11/02/94	WYB2-3	B-2 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/02/94	WYB2-4	B-2 Grid @ 4 feet	NA	NA	NA	NA	ND*
11/04/94	WYB4-1	B-4 Grid @ 1 foot	NA	NA	NA	NA	100*
11/04/94	WYB4-2	B-4 Grid @ 2 feet	NA	NA	NA	NA	100*
11/04/94	WYB4-3	B-4 Grid @ 3 feet	NA	NA	NA	NA	40*
11/04/94	WYB4-4	B-4 Grid @ 4 feet	NA	NA	NA	NA	< 10*
11/4/94	WYB6-1	B-6 Grid @ 1 foot	8.56	16.1	52.1	1,860	16.14
11/4/94	WYB6-1	B-6 Grid @ 1 foot	NA	NA	NA	NA	40*
11/4/94	WYB6-2	B-6 Grid @ 2 feet	NA	NA	NA	NA	40*
11/4/94	WYB6-3	B-6 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/4/94	WYB6-4	B-6 Grid @ 4 feet	NA	NA	NA	NA	ND*
02/08/95	WYFence-B7	Near Fence Line (B7)	1.7	0.57	13	170	U
01/19/95	MY-B9	Beneath fence of MY	19 NJ	11 NJ	23 NJ	2,200 NJ	31
01/26/95	STREET-B9	Outside MY fence @ 1 foot	7.06	BDL	6.98	182	BDL
12/13/94	MYB11-1	B-11 Grid @ 1 foot	ND	42	ND	3,500	2,700 NJ
12/13/94	MYB11-2	B-11 Grid @ 2 feet	U	9.8	18	490	260 NJ
12/13/94	MYB11-3	B-11 Grid @ 3 feet	ND	6.8	11	330	65 NJ
12/13/94	MYB11-4	B-11 Grid @ 4 feet	15 J	6.8	7.0 J	410	32
11/30/94	MYB12-1	B-12 Grid @ 1 foot	9.98	63	60	1,820	158 J
11/30/94	MYB12-2	B-12 Grid @ 2 feet	14	34	26	2,110	250 J
11/30/94	MYB12-3	B-12 Grid @ 3 feet	13.5	15	15	1,240	33 J
11/30/94	MYB14-1	B-14 Grid @ 1 foot	24.7	120	51	20,900	0.182
11/30/94	MYB14-2	B-14 Grid @ 2 feet	26.1	3.4	4.3	54.3	0.75
11/30/94	MYB14-3	B-14 Grid @ 3 feet	6.52	5.2	19	330	8.1 J

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
12/6/94	MYB16-1	B-16 Grid @ 1 foot	20	40/0.128	32	690/0.42	3.49 NJ
12/6/94	MYB16-2	B-16 Grid @ 2 feet	30	16	840	840/0.11	0.049
12/6/94	MYB16-3	B-16 Grid @ 3 feet	7.0	4.0	4.4	120	0.059 NJ
02/27/95	WYC2RAIL-1	C-2 Grid @ 1 foot	NA	4.9	NA	1300	93
02/27/95	WYC2RAIL-2	C-2 Grid @ 2 feet	NA	3.0	NA	760	36.6
11/2/94	WYC5-1	C-5 Grid @ 1 foot	NA	NA	NA	NA	50*
11/2/94	WYC5-2	C-5 Grid @ 2 feet	NA	NA	NA	NA	10*
11/2/94	WYC5-3	C-5 Grid @ 3 feet	NA	NA	NA	NA	10*
11/2/94	WYC5-4	C-5 Grid @ 4 feet	NA	NA	NA	NA	ND*
02/08/95	WYC7Fence	Composite beneath fence line between B-7 & C-7	11	1.4	7.2	220	5.9
01/19/95	MY-C9	Beneath the fence @ C-9	19 NJ	15 NJ	36 NJ	2,800 NJ	3.6
01/26/95	Street-C9	Outside Main Yard fence in C-9 Grid @ 1 foot	69.2	46.7	23.5	4,220	6.57
11/30/94	MYC10-1	C-10 Grid @ 1 foot	UJ	200/1.7	180	6,780/46	196
11/30/94	MYC10-2	C-10 Grid @ 2 feet	UJ	68/0.53	47	3,550/28	19.4
11/30/94	MYC10-3	C-10 Grid @ 3 feet	UJ	32	22	2,120/1.2	16.1
02/20/95	MYC-15	Composite of soil @ C-15 Grid	NA	<0.40	NA	18	U
02/17/95	MYC16	Composite of soil @ C-16 Grid	U	U	5.9	33	U
02/17/95	MYC17	Composite of soil @ C-17 Grid	U	U	5.4	25	U
12/5/94	MYC18-1	C-18 Grid @ 1 foot	18	33	36	1,700	1.25 J
12/5/94	MYC18-2	C-18 Grid @ 2 feet	7.3	4.9	5.2	130	U
12/5/94	MYC18-3	C-18 Grid @ 3 feet	U	5.8	6.2	180/0.47	0.017
03/15/95	19C Cu/Metal fine	Copper/metal pile @ Grid C-19	NA	52	NA	870	306
03/15/95	19C Dirt Pile	Dirt pile @ Grid C-19	NA	12	NA	1,800	46
02/08/95	MYSPILE-2895	Stockpile soil @ D-13 Grid	13	13	24	810	81

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
11/2/94	WYD3-1	D-3 Grid @ 1 foot	11.5	17.5	153	1970	594.8
11/2/94	WYD3-1	D-3 Grid @ 1 foot	NA	NA	NA	NA	100*
11/2/94	WYD3-2	D-3 Grid @ 2 feet	NA	NA	NA	NA	10*
11/2/94	WYD3-3	D-3 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/2/94	WYD3-4	D-3 Grid @ 4 feet	NA	NA	NA	NA	ND*
11/2/94	WYD4-1	D-4 Grid @ 1 foot	NA	NA	NA	NA	50*
11/2/94	WYD4-2	D-4 Grid @ 2 feet	NA	NA	NA	NA	30*
11/2/94	WYD4-3	D-4 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/2/94	WYD4-4	D-4 Grid @ 4 feet	NA	NA	NA	NA	ND*
11/2/94	WYD6-1	D-6 Grid @ 1 foot	NA	NA	NA	NA	ND*
11/2/94	WYD6-2	D-6 Grid @ 2 feet	NA	NA	NA	NA	ND*
11/2/94	WYD6-3	D-6 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/2/94	WYD6-4	D-6 Grid @ 4 feet	NA	NA	NA	NA	ND*
02/22/95	WYD8-Fence	Composite beneath fence line @ D-8 Grid	NA	<0.50	NA	57	U
01/19/95	MY-D9	Inside of fence @ D-9 Grid	11 NJ	13 NJ	140 NJ	1,000 NJ	3.6
02/22/95	MYDFence-9	D-9 fence Composite on the outside	NA	1.2	NA	720	13.3
02/24/95	MYDFence-9	West on sidewalk of Main Yard fence @ 1	NA	U	NA	24	U
01/26/95	Street-D9	foot	6.55	4.58	10.1	409	BDL
11/30/94	MYD10-1	D-10 Grid @ 1 foot	UJ	110/0.76	150	13,400/21	236
11/30/94	MYD10-2	D-10 Grid @ 2 feet	UJ	70/0.5	81	3,620/12	130
11/30/94	MYD10-3	D-10 Grid @ 3 feet	U	19	18	1,830/0.41	2.40 J
12/01/94	MY-FLUFF	Fluff/soil pile @ D-11 Grid	EP TOX 0.66	EP TOX 1.2	EP TOX <0.25	EP TOX 49	773
12/13/94	FLUFF-121394	Fluff/soil pile @ D-12 Grid	U	75/0.78	260/0.087	4300/6.5	108 NJ
12/13/94	MYD12	Duplicate of Fluff-121394	U	88/0.47	190/0.090	3400/1.8	136 NJ
02/08/95	MYSPILE-2895	Pile in Grid D-12	13	13	24	810/0.34	81
12/2/94	MYD14-1	D-14 Grid @ 1 foot	54	25	48	815	10
12/2/94	MYD14-2	D-14 Grid @ 2 feet	U	7.8	12	950	12
12/2/94	MYD14-3	D-14 Grid @ 3 feet	UJ	2.0	3.3	58.3	1.3
01/21/95	MYD16-1	D-16 Grid @ 1 foot	UJ/U	56 NJ/0.41	50 NJ/U	5,900 NJ/11	U
01/21/95	MYD16-2	D-16 Grid @ 2 foot	UJ/U	71 NJ/0.33	91 NJ/U	7,300 NJ/11	U
01/21/95	MYD16-3	D-16 Grid @ 3 foot	UJ/U	50 NJ/0.33	68 NJ/U	7,000 NJ/10	U

Table 3  
U.S. EPA STANDARD SCRAP SITE  
PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
01/21/95	CuFines	Copper fines pile @ D-16 Grid	UJ/U	250 NJ/.078	560 NJ/.034	740 NJ/U	249
01/21/95	MYD18-1	D-18 Grid @ 1 foot	UJ/U	33 NJ/0.045	55 NJ/U	2,500 NJ/0.59	U
01/21/95	MYD18-2	D-18 Grid @ 2 foot	UJ/U	25 NJ/0.023	47 NJ/U	9,300 NJ/0.11	U
01/21/95	MYD18-3	D-18 Grid @ 3 foot	UJ/U	67 NJ/0.090	95 NJ/U	6,800 NJ/0.69	U
03/15/95	18D Cu Fine	Copper fine pile @ D-19 Grid	NA	27	NA	76	329
11/2/94	WYE2-1	E-2 Grid @ 1 foot	NA	NA	NA	NA	100*
11/2/94	WYE2-2	E-2 Grid @ 2 feet	NA	NA	NA	NA	50*
11/2/94	WYE2-3	E-2 Grid @ 3 feet	NA	NA	NA	NA	20*
11/2/94	WYE2-4	E-2 Grid @ 4 feet	NA	NA	NA	NA	ND*
11/15/94	WYEF2-S5	Between E-2 & F-2	NA	NA	NA	NA	220*
12/6/94	WYE2-S5	Center of Grid	U	4.8	8.4	140	69
11/2/94	WYE3-1	E-3 Grid @ 1 foot	NA	NA	NA	NA	60*
11/2/94	WYE3-2	E-3 Grid @ 2 feet	NA	NA	NA	NA	80*
11/2/94	WYE3-3	E-3 Grid @ 3 feet	NA	NA	NA	NA	80*
11/2/94	WYE3-4	E-3 Grid @ 4 feet	NA	NA	NA	NA	20*
12/6/94	WYE3-S5	Center of Grid	U	4.4	7.1	150	40 J
11/2/94	WYE4-1	E-4 Grid @ 1 foot	NA	NA	NA	NA	100*
11/2/94	WYE4-2	E-4 Grid @ 2 feet	NA	NA	NA	NA	100*
11/2/94	WYE4-3	E-4 Grid @ 3 feet	NA	NA	NA	NA	40*
11/2/94	WYE4-4	E-4 Grid @ 4 feet	NA	NA	NA	NA	40*
11/2/94	WYE5-1	E-5 Grid @ 1 foot	NA	NA	NA	NA	100*
11/2/94	WYE5-2	E-5 Grid @ 2 feet	NA	NA	NA	NA	60*
11/2/94	WYE5-3	E-5 Grid @ 3 feet	NA	NA	NA	NA	80*
11/2/94	WYE5-4	E-5 Grid @ 4 feet	NA	NA	NA	NA	ND*
12/7/94	WYE6-1	E-6 Grid @ 1 foot	9.02	31/0.062	180	1,700/7.6	0.069 J
12/7/94	WYE6-2	E-6 Grid @ 2 feet	ND	2.5/ND	ND	150/0.21	0.01 J
12/7/94	WYE6-3	E-6 Grid @ 3 feet	ND	ND	8.7	ND	ND
12/7/94	WYE6-4	E-6 Grid @ 4 feet	ND	ND	ND	ND	ND
02/27/95	WYE6RAIL-1	Rail line @ E-6, 1 foot	NA	16	NA	3,200	497
02/27/95	WYE6RAIL-2	Rail line @ E-6, 2 feet	NA	11	NA	3,600	4.0
02/20/95	WYE-7	Composite of E-6 & E-7 Grids	NA	<0.49	NA	11	U

Table 3  
U.S. EPA STANDARD SCRAP SITE  
PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
02/22/95	WYE8-Fence	Composite outside fence @ E-8 Grid	NA	<0.53	NA	15	U
12/2/94	MYE12-1	E-12 Grid @ 1 foot	ND	40	150	1,580	101
12/2/94	MYE12-2	E-12 Grid @ 2 feet	ND	17	34	2,380	19.1
12/2/94	MYE12-3	E-12 Grid @ 3 feet	ND	4.7	7.0	970	4.4
06/07/95	MYE13-PAD	Soil on top of the new pad	NA	19	NA	5,800	190
03/15/95	18E-Cu Fine	Pile @ E-18 Grid	NA	130	NA	3,800	550
03/15/95	19E-Metal Pile	Metal & Debris Pile @ E-19 Grid	NA	5.8	NA	U	17.8
12/06/94	MYEF18-1	Between E & F-18 @ 1 Foot	50	56/0.417	56	12,000/11	0.017 J
12/06/94	MYEF18-2	Between E & F-18 @ 2 feet	16	11	25	1,900/3.3	0.937
12/06/94	MYEF18-3	Between E & F-18 @ 3 feet	24	19	33	3,200/11	0.142
12/06/94	MYEF18-4	Between E & F-18 @ 4 feet	U	25	49	5,400/35	0.007
11/02/94	WYF2-1	F-2 Grid @ 1 foot	NA	NA	NA	NA	40*
11/02/94	WYF2-2	F-2 Grid @ 2 feet	NA	NA	NA	NA	10*
11/02/94	WYF2-3	F-2 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/02/94	WYF2-3	F-2 Grid @ 3 feet	2.68	<0.93	8.73	36.1	1.660
11/02/94	WYF2-4	F-2 Grid @ 4 feet	NA	NA	NA	NA	ND*
11/22/94	WYF4-NON HAZ 112294	Non-Haz soil stockpile	1.92	< 0.90	2.83	11.3	41.6
11/09/94	WYSTOCKPILE 1	Non-Haz soil stockpile	5.50	6.23	67.2	721	14.9
11/17/94	HAZSTOCK PILE-WY 2	Hazardous soil stockpile	NA/<0.24 EPTOX <0.24	NA/0.07 EPTOX 0.05	NA/<0.12 EPTOX <0.12	NA/0.50 EPTOX 0.07	149
11/02/94	WYF4-1	F-4 Grid @ 1 foot	NA	NA	NA	NA	50*
11/02/94	WYF4-2	F-4 Grid @ 2 feet	NA	NA	NA	NA	20*
11/02/94	WYF4-3	F-4 Grid @ 3 feet	NA	NA	NA	NA	40*
11/02/94	WYF4-4	F-4 Grid @ 4 feet	NA	NA	NA	NA	20*
11/2/94	WYF6-1	F-6 Grid @ 1 foot	NA	NA	NA	NA	100*
11/2/94	WYF6-2	F-6 Grid @ 2 feet	NA	NA	NA	NA	ND*
11/2/94	WYF6-3	F-6 Grid @ 3 feet	NA	NA	NA	NA	ND*
11/2/94	WYF6-4	F-6 Grid @ 4 feet	NA	NA	NA	NA	ND*
02/07/95	Fence-F9	Fence line between G & F-9	23	17	29	3,000	48.7
02/07/95	Fence-GF9	Duplicate of Fence-F9	26	23	35	1,000	54.9
03/23/95	MYP9-WALL	Fence wall @ F-9	NA	0.59	NA	130	U

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
11/30/94	MYF10-1	F-10 Grid @ 1 foot	U	33/0.005	38	3,140/0.10	27.2
11/30/94	MYF10-2	@ 2 feet	UJ	11	24	1,120	4.0
11/30/94	MYF10-3	@ 3 feet	UJ	2.4	2.9	53.8	0.246
03/23/95	MYF10-COMP	COMPOSITE	NA	U	NA	U	NA
11/30/94	MYF11-1	F-11 Grid @ 1 foot	UJ	71	93	11,300	184
11/30/94	MYF11-2	F-11 Grid @ 2 feet	UJ	63	69	2,390	9.3
11/30/94	MYF11-3	F-11 Grid @ 3 feet	UJ	7.5	5.6	374	1.0
01/18/95	MY-DUMP-1	Fluff box dump	ND	72	160	2,200	103 NJ
03/10/95	MYF13-WALL	Wall along RR tracks @ F-13	NA	23	NA	4,100	10
11/30/94	MYF14-1	F-14 Grid @ 1 foot	16.1	77	134	1,760	0.054
11/30/94	MYF14-2	F-14 Grid @ 2 feet	21.0	55	58	3,670	28.6
11/30/94	MYF14-3	F-14 Grid @ 3 feet	6.29	13	9.4	798	0.34
03/10/95	MYF14-WALL	Wall along RR tracks @ F-14	NA	U	NA	1,800	U
03/10/95	MYF15-WALL	Wall along RR tracks @ F-15	NA	U	NA	6300	U
11/22/94	MYF-16	F-16 Grid-Copper product bin, north of conveyor	0.52	<0.81	1.11	1,100/15.1 EP TOX 5.24	465
11/22/94	MYF-17	F-17 Grid-Shredded steel	<3.0	<0.80	18.0	1,400	39.6
03/13/95	MYF17-Cu Hopper	F-17 Grid Copper Hopper	NA	UD	NA	UD	62
03/20/95	MYF17-Cu Hopper 2	Copper/debris pile @ F-17 Grid	NA	38	NA	110	500
03/22/95	MYF17-Cu Hopper 3	F-17 Grid Copper Hopper	NA	U	NA	U	5.0
03/22/95	MYF17-Cu Hopper 4	F-17 Grid Copper Hopper	NA	1.3	NA	U	25.9 E
03/13/95	MYF18-POSTSHRD	Shredder pile @ F-18 Grid	NA	UD	NA	UD	6.8
03/15/95	MYF18-POSTSHRD 2	Shredded scrap pile @ F-18	NA	0.74	NA	U	7.6
03/22/95	MYF18-PostSHD 3	Debris Pile @ F-18 Grid	NA	U	NA	U	1.5
03/22/95	MYF18-POSTSHD4	F-18 Post Shredder Pile	NA	U	NA	U	2.6
05/05/95	MYF19-1	F-19 Grid @ 1 foot on high pad	NA	46	NA	490	118.2 E
11/07/94	WY1107A(T)	G-6 Grid at surface	NA	NA	NA	NA	ND*
11/07/94	WY1107B(B)	G-6 Grid at 3.5 feet	NA	NA	NA	NA	ND*
11/4/94	WYG6-1	G-6 Grid @ 1 foot	NA	NA	NA	NA	20*
11/4/94	WYG6-2	G-6 Grid @ 2 feet	NA	NA	NA	NA	10*
11/4/94	WYG6-3	G-6 Grid @ 3 feet	NA	NA	NA	NA	100*

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
11/9/94	CYCLONE-1	Box under Cyclone @ G-10	5.10/0.55	99.6	170	1,940	612
11/17/94	CYCLONE-2	Box under Cyclone @ G-10	7.69/ <0.24	79.3/2.8	120/ <0.12	2,400/4.0	913
12/13/94	HOP BOX #1	Box #1 under Cyclone @ G-10	U	220/0.93	240/0.097	2,200/0.39	162.5
12/13/94	HOP BOX #2	Box #2 under Cyclone @ G-10	U	210/0.49 NJ	240 UJ	3,000/3.2 NJ	57.9
12/13/94	HOP BOX #3	Box #3 under Cyclone @ G-10	U	81/0.79 NJ	160/0.11 NJ	2,300/1.7 NJ	173.7
12/13/94	HOP BOX #4	Box #4 under Cyclone @ G-10	U	79/0.013	230/0.13 NJ	3,200/0.16	167.7
12/13/94	HOP BOX #5	Box #5 under Cyclone @ G-10	U	180/0.30 NJ	220/0.076 NJ	3,000/1.2 NJ	63.1
05/09/95	Main Bldg. Floor Sweepings	Inside Main Bldg @ G-10 Grid (After Cleanup)	<9.6 NA	<0.48 0.85	6.3 NA	15 <4.5	U 160
05/09/95	Hopper Box G11-1	Hopper box (fluff) @ G-11	NA	140	NA	1,800	700
05/09/95	Pregrinder copper	Pre-grinder copper @ Grid G-11	NA	130	NA	1,100	350
11/21/94	MYG-12	G-12 Grid-Soil @ 6 inch depth	12.4	52.3	107	2,480/7.97 EP TOX 40.5	333
02/27/95	MYG14-RAIL 1	G-14 Grid Rail @ 1 foot	NA	13	NA	1,400	80
02/27/95	MYG14-RAIL 2	G-14 Grid Rail @ 2 feet	NA	32	NA	5,100	17.8
11/30/94	MYG15-1	G-15 Grid @ 1 foot	44.6	65/0.44	250	32,000/3.1	199
11/30/94	MYG15-2	G-15 Grid @ 2 feet	17.7	44/0.45	80	5,450/14	7.7
11/30/94	MYG15-3	G-15 Grid @ 3 feet	15.3	50/0.39	25	4,100/4.1	1.43
11/22/94	MYG-16	Dirt under conveyor @ G-16	5.51	103	322	780	461
03/07/95	MYG16-COMP	Confirmation @ G-16 Grid	NA	<0.42	NA	7.8	U
05/22/95	MYGH-16	Composite around shredder between G-16 & H-16 Grids	NA	30	NA	2,600	110
05/22/95	MYG-17	Composite on the east side of shredder in G-17 Grid	NA	40	NA	20,000	220

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
11/22/94	MYG-18	Copper fine pile @ G-18	20	100	280	650	1,060
05/05/95	MYG18-1	G-18 Grid @ 1 foot	NA	140	NA	1,000	170.6 E
05/05/95	MYG18-2	G-18 Grid @ 2 feet	NA	U	NA	49	6.5
05/05/95	MYG18-3	G-18 Grid @ 3 feet	NA	2	NA	580	1.4
05/05/95	MYG18-4	Duplicate of G18-1	NA	NA	NA	NA	183 E
01/21/95	MYG19-1	G-19 Grid @ 1 foot	UJ/U	30 NJ/0.37	38 NJ/U	4,300 NJ/12	U
01/21/95	MYG19-2	G-19 Grid @ 2 foot	UJ/U	44 NJ/0.19	65 NJ/U	4,900 NJ/6.8	U
01/21/95	MYG19-3	G-19 Grid @ 3 foot	UJ/U	48 NJ/0.26	46 NJ/U	5,900 NJ/11	U
12/07/94	MYEH8	West sidewalk of Main Yard @ H-8 Grid	9.72	56	100	1,900	26.8
03/11/95	MYH8-COMP	Confirmation @ H-8 Grid	NA	U	NA	8.8	U
11/22/94	MYH-10	H-10 Grid-Dirt beneath 2 <sup>nd</sup> grinder inside Bldg	14.7	136	136	1,680/ <0.21 EP TOX 1.89	1,271
05/18/95	MYH13-1	H-13 Grid @ 1 foot	NA	41	NA	810	292
05/18/95	MYH13-2	H-13 Grid @ 2 foot	NA	2	NA	480	2.4
05/18/95	MYH14-1	H-14 Grid @ 1 foot	NA	3.3	NA	400	4.2
05/18/95	MYH14-2	H-14 Grid @ 2 foot	NA	U	NA	120	U
11/21/94	MYH-14	Steel & dirt pile @ H-14	17	98	160	1,600	737
11/21/94	MYH-15	H-15 Grid Soil	7.88	101	394	1,430	841
11/22/94	MYH-15	3 stockpiles composite @ H-15	22.7	125	170	1,470	1,851
03/13/95	MYH15CU-HOPPER	H-15 COPPER HOPPER	NA	12	NA	150	426
03/20/95	MYH15-Cu Hopper 2	Copper/debris pile @ H-15 Grid	NA	12	NA	110	55
03/22/95	MYH15-Cu Hopper 3	Copper/debris pile @ H-15 Grid	NA	4	NA	U	7.1
03/22/95	MYH15CU-HOPPER 4	H-15 COPPER HOPPER	NA	U	NA	U	2.0
05/25/95	MYH15-H BOX	Hopper Box @ Grid H-15	NA	NA	NA	NA/2.3	238
06/07/95	MYH15-SURFACE	H-15 Grid surface composite	NA	28	NA	3,800	56
11/22/94	MYH-15A	Copper product bin @ H-15	4.1	110	53	600	311
11/22/94	MYH-16	H-16 Grid-Copper fine by shredder	31	46	170	660	465
05/22/95	MY-BGHSE PAD	From concrete pad under the shredder baghouse @ H-16	NA	160	NA	1,100	440



**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg				
			TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
12/05/94	MYH19-1	H-19 Grid @ 1 foot	6.0	8.5	17	420	1.227
12/05/94	MYH19-2	H-19 Grid @ 2 feet	7.6	23	2.7	270	U
12/05/94	MYH19-3	H-19 Grid @ 3 feet	U	26/0.004	53	2,400/0.30	0.29
05/09/95	MYH20-1	H-20 Grid @ 1 foot	NA	16	NA	2,400	9.8
05/09/95	MYH20-2	H-20 Grid @ 2 foot	NA	22	NA	2,300	0.83
05/09/95	MYH20-3	H-20 Grid @ 3 foot	NA	1.1	NA	75	U
05/09/95	H20-RR Tracks	RR tracks at Grid H-20	NA	65	NA	1,000	290
03/13/95	WYI8-1	I-8 Grid @ 1 foot	NA	<0.33	NA	260	U
03/13/95	WYI8-2	I-8 Grid @ 2 feet	NA	1.2	NA	410	U
03/13/95	MYI9-1 ft	I-9 Grid @ 1 foot	NA	<0.58	NA	300	0.9
03/13/95	MYI9-2 ft	I-9 Grid @ 2 feet	NA	<0.49	NA	19	U
11/22/94	MYI10	I-10 Grid-Dirt by gravity separator inside Bldg	<3.0	54	81	1,800	1,555
03/30/95	MYI10-TRENCH	I-10 GRID TRENCH	NA	50	NA	1,300	290
04/24/95	MYI12-1	I-12 Grid soil @ 1 foot	NA	1.4	NA	320	U
04/24/95	MYI12-2	I-12 Grid soil @ 2 feet	NA	9.8	NA	460	20
11/21/94	MYI13	I-13 Grid-Soil on concrete	9.9	34	92	1500	429
11/21/94	MYI14	I-14 Grid-soil & scrap pile	10.9	72	497	32,700/1.83 EP TOX 0.75	519
12/2/94	MYI14-1	I-14 Grid @ 1 foot	UJ	3.7	63	29.8	0.022
12/2/94	MYI14-2	I-14 Grid @ 2 feet	5.1 NJ	4.7	2.6	172	0.279
12/2/94	MYI14-3	I-14 Grid @ 3 feet	UJ	2.3	4.8	141	1.61
05/01/95	MYI14-1	I-14 Grid @ 1 foot	NA	0.72	NA	210	U
05/01/95	MYI14-2	I-14 Grid @ 2 foot	NA	<0.56	NA	170	U
05/01/95	MYI14-3	I-14 Grid @ 3 foot	NA	<0.44	NA	7.9	U
05/01/95	MYI14-4	Duplicate of I14-1	NA	<0.52	NA	200	U
05/18/95	MYI15-Hop Box Comp	Composite of Fluff from 6 Hopper Boxes @ I-15	NA	160	NA	2,200	1,030

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
11/22/94	MYI-16	I-16 Grid-Shredder reject pile	16.1	181	131	1,100	1,737
03/13/95	MYI16-BAGHSE	I-16 Baghouse	NA	540	NA	2,300	289.4
03/20/95	MYI16-BagHSE 2	Soil/Debris Pile by I-16 Baghouse	NA	210	NA	1,200	890
03/22/95	MYI16-BAGHSE 3	Soil/Debris Pile by I-16 Baghouse	NA	210	NA	1,300	
03/22/95	MYI16-BAGHSE 4	Soil/Debris Pile by I-16 Baghouse	NA	230	NA	1,300	790
							1,100
11/22/94	MYI-19	I-19 Grid-dirt pile	<0.45	21.4	146	2,030/0.44	22.63
04/18/95	MYI19-SPile	Soil stockpile @ Grid I-19	NA	92	NA	EP TOX 3.61 1,900	410
03/13/95	MYJ9-1 Ft	J-9 Grid @ 1 Foot		28		360	1.5
03/13/95	MYJ9-2 Ft	J-9 Grid @ 2 Feet		<0.55		50	U
12/2/94	MYJ12-1	J-12 Grid @ 1 foot	UJ	4.3	7.7	435	U
12/2/94	MYJ12-2	J-12 Grid @ 2 feet	UJ	8.0	U	290	0.505
12/2/94	MYJ12-3	J-12 Grid @ 3 feet	UJ	3.5	6.5	101	0.635
11/21/94	MYJ-14	Copper & steel pile @ J-14	27	70	150	1000	924
11/21/94	MYJ-14A	Soil pile south of J-14	10.2	42.8	112	2,850/0.62 EP TOX 17.8	297
05/25/95	MYJ15-H BOX 1	Hopper box #1 @ J-15 Grid	NA	NA	NA	NA/2.5	325
05/25/95	MYJ15-H BOX 2	Hopper box #2 @ J-15 Grid	NA	NA	NA	NA/0.34	480
05/25/95	MYJ15-H BOX 3	Hopper box #3 @ J-15 Grid	NA	NA	NA	NA/0.51	590
05/25/95	MYJ15-H BOX 4	Hopper box #4 @ J-15 Grid	NA	NA	NA	NA/6.4	268
05/25/95	MYJ15-H BOX 5	Hopper box #5 @ J-15 Grid	NA	NA	NA	NA/0.65	610
04/19/95	MYJKL15-S.Pile	Stockpile @ J,K,L-15 Grids	NA	32	NA	1,000	224
11/22/94	MYJ-16	Feed stock @ J-16 Grid	13.1	63.4	98.6	3,120/ <0.2 EP <0.2	554
05/25/95	MYJ16-H BOX	Fluff box by shredder feeder @ J-16 Grid	NA	NA	NA	NA/8.5	860
11/22/94	MYJ-17	Shredder reject pile @ J-17 Grid	29.4	15.2	223	233	853
05/18/95	MYJ17-Hopper Box	Composite of Hopper Box @ J-17	NA	160	NA	2,200	286
11/22/94	MYJ-18	Dirt pile @ J-18 Grid	9.16	125	77.9	1,370/0.26 EP TOX <0.21	508

Table 3  
U.S. EPA STANDARD SCRAP SITE  
PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
11/22/94	MYJ-19	Dirt pile @ J-19 Grid	23.6	81.1	123	955	472
03/13/95	MYK9-1	K-9 Grid @ 1 foot	NA	1.1	NA	300	U
03/13/95	MYK9-2	K-9 Grid @ 2 feet	NA	2.8	NA	170	4.5
03/30/95	MYK10-CU FINE	Copper Fine Pile @ K-10	NA	4.3	NA	97	5.2 J
03/31/95	MYK10 033195	Copper Fine Pile @ K-10	NA	29	NA	200	125
11/22/94	MYK-11	#2 Copper chop box inside Bldg @ K-11 Grid	<3.0	<0.8	6.9	3,200	3.3
05/01/95	MYK14-16 Sidewall	Sidewall along K-14, K-15, & K-16	NA	0.75	NA	340	8.6
04/19/95	MYK161718 S.PILE	Stockpile in Grids K-16, K-17, & K-18	NA	120	NA	3,200	490
03/13/95	MYK17-PRESHD	Pre Shredder Pile @ K-17	NA	UD	NA	UD	19.4
03/20/95	MYK17-PRESHD 2	Pre Shredder Pile @ K-17	U	NA	NA	U	9.6
03/22/95	MYK17-PRESHD 3	Debris Pile @ K-17 Grid	NA	16	NA	260	134.5
03/22/95	MYK17-PRESHD 4	K-17 Pre Shredder Pile	NA	51	NA	380	480 E
11/22/94	MYK-19	Feed stock pile @ K-19 Grid	NA	51	150	2,000	335
05/09/95	MYK20-1	K-20 Grid @ 1 foot	NA	13	NA	1,300	13.3
05/09/95	MYK20-2	K-20 Grid @ 2 foot	NA	3.4	NA	310	5.4
03/13/95	MYL9-1	L-9 Grid @ 1 foot	NA	<0.59	NA	84	U
03/13/95	MYL9-2	L-9 Grid @ 2 feet	NA	<0.53	NA	14	1.1
03/30/95	MYL10-CU FINE	Copper Fine Pile @ L-10	NA	120	NA	670	78 J
03/31/95	MYL10-033195	Copper Fine Pile @ L-10	NA	U	NA	UD	390
12/02/94	MYL12-1	L-12 Grid @ 1 foot	98	17	46	403	U
12/02/94	MYL12-2	L-12 Grid @ 2 feet	U	8.4	200	1710	0.42
12/02/94	MYL12-3	L-12 Grid @ 3 feet	UJ	2.1	7.5	2140	U
04/24/95	MYL14-1	L-14 Sample @ 1 foot	NA	45	NA	1,400	350
04/24/95	MYL14-2	L-14 Sample @ 2 feet	NA	4.4	NA	270	14
05/01/95	MYL14-Comp	Confirmation @ L-14	NA	<0.47	NA	12	U
05/01/95	MYL14-16 Sidewall	Sidewall along L14, L15, and L16 Grid line	NA	2.4	NA	5,500	7.0
05/01/95	MYLM14-Sidewall	Sidewall along L-14 & M-14	NA	1.4	NA	2,600	1.9

**Table 3**  
**U.S. EPA STANDARD SCRAP SITE**  
**PRE-EXCAVATION AND STOCKPILES' ANALYTICAL RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION Mg/Kg TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION MG/L				
04/24/95	MYL15-1	L-15 Sample @ 1 foot	NA	38	NA	940	318
04/24/95	MYL15-2	L-15 Sample @ 2 feet	NA	2.5	NA	890	12
04/24/95	MYL15-3	L-15 Sample @ 3 feet	NA	U	NA	80	1.3
05/01/95	MYLM16-Sidewall	Sidewall between L-16 and M-16 Grids	NA	<0.60	NA	390	5.0
04/24/95	MYL16-1	L-16 Sample @ 1 foot	NA	12	NA	740	1,100
04/24/95	MYL16-2	L-16 Sample @ 1 foot	NA	2.5	NA	660	3,300
04/24/95	MYL16-3	L-16 Sample @ 1 foot	NA	5.1	NA	1,000	120
04/24/95	MYL16-4	Duplicate of L16-2	NA	4	NA	570	5,000
05/05/95	MYL17-1	L-17 Grid @ 1 foot	NA	16	NA	600	73.4 E
05/05/95	MYL17-2	L-17 Grid @ 2 feet	NA	0.5	NA	320	5.7
05/05/95	MYL17-3	L-17 Grid @ 3 feet	NA	U	NA	22	U
04/19/95	MYL19-S.PILE	Stockpile at L-19 Grid	NA	86	NA	3,500	287
05/09/95	MYL20-1	L-20 Grid @ 1 foot	NA	17	NA	3,500	42
05/09/95	MYL20-2	L-20 Grid @ 2 foot	NA	11	NA	1,500	1.3
05/09/95	MYL20-3	L-20 Grid @ 3 foot	NA	<0.59	NA	30	U
05/11/95	MYM-15	Surface sample @ M-15 Grid	NA	21	NA	1,600	191
04/19/95	MYMNO17-S.Pile	Stockpile @ M,N,O-17 Grids	NA	41	NA	2,900	110
12/05/94	MYN19-1	N-19 Grid @ 1 foot	U	12	17	410	4.79
12/05/94	MYN19-2	N-19 Grid @ 2 feet	U	U	12	220	0.02 J
04/04/95	TRAILER CU FINE	Trailer @ P-13 before shipment	NA	NA	NA	NA	29

1 - This grid was further excavated. No sampling was done after excavation because the PCB concentration was close to the action level of 10 mg/kg.

ND - Not detected. Analyte below the instrument detection level.

NA - Not analyzed

\* - PCB Analysis done with GC/MS at E & E warehouse

**Table 4**  
**U.S. EPA STANDARD SCRAP SITE**  
**REMOVAL ACTION CLEANUP CONFIRMATION SAMPLE RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION IN Mg/Kg. TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION IN MG/L				
			ARSENIC TOTAL/TCLP	CADMIUM TOTAL/TCLP	CHROMIUM TOTAL/TCLP	LEAD TOTAL/TCLP	PCBS TOTAL
11/07/95	WYB2-COMP	Confirmation @ B-2	NA	NA	NA	NA	ND*
01/25/95	WYB3-COMP	Confirmation @ B-3	2.01	BDL	6.36	8.32	0.193
01/25/95	WYB4-COMP	Confirmation @ B-4	1.63	BDL	6.09	10.2	0.596
02/06/95	WYB5-COMP	Confirmation @ B-5	<10.2	<0.46	6.3	14	2.9
02/06/95	WYB6-COMP	Confirmation @ B-6	NA	BDL	NA	5.93	17.02
02/06/95	WYB7-COMP	Confirmation @ B7	NA	BDL	NA	10.1	3.621
02/06/95	WYB7-S6	DUPLICATE OF WYB7	NA	BDL	NA	15.7	2.663
01/06/95	MYB10-COMP	COMPOSITE	ND	ND	ND	52	0.084 NJ
12/13/94	MYB11-COMP	Confirmation @ B-11	ND	21/0.069	21/0.075	1,500/0.67	1970 NJ
01/06/95	MYB11-COMP	Confirmation @ B-11	ND	ND	ND	ND	1.20 NJ
01/06/95	MYB11-S6	Duplicate of MYB11-COMP	ND	ND	ND	ND	2.74 NJ
02/09/95	MYB12-COMP	B-12 Grid Confirmation @ 3 feet	3.1	U	7.8	11	U
02/10/95	MYB13-COMP	Confirmation @ B-13 Grid	2.8	U	6	15	U
01/25/95	WYC3-COMP	Confirmation @ C-3 Grid	BDL	BDL	4.66	3.00	0.103
01/25/95	WYC4-COMP	Confirmation @ C-4 Grid	1.68	BDL	4.58	BDL	0.273
02/06/95	WYC5-COMP	Confirmation @ C-5 Grid	<9.2	<0.46	8.0	22	2.1
02/08/95	WYC6-COMP	Confirmation @ C-6 Grid	1.5	U	4.7	9.5	3.4

**Table 4**  
**U.S. EPA STANDARD SCRAP SITE**  
**REMOVAL ACTION CLEANUP CONFIRMATION SAMPLE RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION IN Mg/Kg. TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION IN MG/L				
			ARSENIC TOTAL/TCLP	CADMIUM TOTAL/TCLP	CHROMIUM TOTAL/TCLP	LEAD TOTAL/TCLP	PCBS TOTAL
02/08/95	WYC7-COMP	Confirmation @ C-7 Grid	2.6	0.89	6.8	12	U
01/19/95	MY-C9	Beneath the fence @ C-9	19 NJ	15 NJ	36 NJ	2,800 NJ	3.6
01/06/95	MYC10-COMP	Confirmation @ C-10 Grid	ND	ND	ND	ND	ND
01/11/95	MYC11-COMP	Confirmation @ C-11 Grid	ND	0.69	3.7	ND	0.32
02/07/95	MYC12-COMP	Confirmation @ C-12 Grid	2.5	U	6.6	11	U
02/10/95	MYC13-COMP	Confirmation @ C-13 Grid	2.1	U	2.8	7.2	U
02/13/95	MYC13-WALL	Westwall of C-13 Grid	22	16/0.17	66/0.014	14,000/3.3	18.5
02/20/95	MYC-14	Confirmation @ C-14 Grid	NA	<0.49	NA	32	U
02/20/95	MYC-15	Composite of soil @ C-15 Grid	NA	<0.40	NA	18	U
02/17/95	MYC16	Composite of soil @ C-16 Grid	U	U	5.9	33	U
02/17/95	MYC17	Composite of soil @ C-17 Grid	U	U	5.4	25	U
02/17/95	MCY18-COMP	Composite of soil @ C-18 Grid	U	U	6	12	U
02/17/95	MYC19-COMP	Composite of soil @ C-19 Grid	U	0.52	7.1	46	U
12/22/94	WYD2-COMP	Confirmation @ D-2 Grid	ND	4.2	9.5	130	14.9
12/24/94	WYD3-COMP	Confirmation @ D-3 Grid	U	2.9	5.3	8.8	7.7 NJ
12/22/95	WYD4-COMP	Confirmation @ D-4 Grid	U	3.0	6.3	10	3.9 J
02/06/95	WYD5-COMP	Confirmation @ D-5 Grid	<9.6	<0.48	6.8	14	U
02/14/95	WYD6-COMP	Confirmation @ D-6 Grid	1.5	ND	2.9	42	3.4
02/14/95	WYD7-COMP	Confirmation @ D-7 Grid	2.1	ND	6.8	14	U
02/22/95	WYD8-Fence	Composite beneath fence line @ D-8 Grid	NA	<0.50	NA	57	U
01/19/95	MY-D9	Inside of fence @ D-9 Grid	11 NJ	13 NJ	140 NJ	1,000 NJ	3.6
02/24/95	MYDFence-9	D-9 fence Confirmation	NA	U	NA	24	U

Table 4  
U.S. EPA STANDARD SCRAP SITE  
REMOVAL ACTION CLEANUP CONFIRMATION SAMPLE RESULTS

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION IN Mg/Kg. TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION IN MG/L				
			ARSENIC TOTAL/TCLP	CADMIUM TOTAL/TCLP	CHROMIUM TOTAL/TCLP	LEAD TOTAL/TCLP	PCBS TOTAL
01/26/95	Street-D9	West on sidewalk of Main Yard fence @ 1 foot	6.55	4.58	10.1	409	ND
01/10/95	MYD10-COMP	Confirmation @ D-10 Grid	8.8	1.2	4.8	5.8	0.01
01/27/95	MYD11-COMP	Confirmation @ D-11 Grid	2.24	BDL	7.02	6.22	BDL
02/17/95	MYD12-Comp	Confirmation @ D-12 Grid	U	U	6	10	U
03/03/95	MYD13-COMP	Confirmation @ D-13 Grid	NA	20.49	NA	8.4	U
12/20/94	WYE2-COMP	Confirmation @ E-2 Grid	UJ	1.6	3.5	7.2 NJ	0.10
01/07/95	WYE3-COMP	Confirmation @ E-3 Grid	ND	ND	ND	ND	0.017
12/6/94	WYE4-COMP	Confirmation @ E-4 Grid	NA	NA	NA	NA	1.9
11/29/94	WYE5-COMP	Confirmation @ E-5 Grid	1.93	<0.86	2.89	6.74	2.57
3/21/95	MYE10-COMP	Confirmation @ E-10 Grid	NA	U	NA	13	2.9
3/21/95	MYE11-COMP	Confirmation @ E-11 Grid	NA	U	NA	22	U
03/10/95	MYE13-COMP	Confirmation @ E-13 Grid	NA	U	NA	8.4	U
03/09/95	MYE14-COMP	Confirmation @ E-14 Grid	NA	U	NA	10	38
03/15/95	18E-Cu Fine	Pile @ E-18 Grid		130		3,800	550
11/29/94	WYF2COMP-8	Confirmation @ F-2 Grid	NA	NA	NA	NA	ND*
11/22/94	WYF3-COMP	Confirmation @ F-3 Grid	3.05	<0.87	5.34	7.19	1.860
11/14/94	WYF4-COMP	Confirmation @ F-4 Grid	3.02	<0.86	5.5	10.8	4.450
11/14/94	WYF5-COMP	Confirmation @ F-5 Grid	3.05	<0.87	4.79	5.23	0.251
11/14/94	WYF6-COMP	Confirmation @ F-6 Grid	2.71	<0.87	<1.08	7.04	0.191
03/11/95	WYF8-COMP	Confirmation @ F-8 Grid	NA	U	NA	20	U
3/23/95	MYF9-COMP	Confirmation @ F-9 Grid	NA	U	NA	6.9	U
3/23/94	MYF9-WALL	Fence wall @ F-9	NA	0.59	NA	130	U

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			ARSENIC TOTAL/TCLP	CADMIUM TOTAL/TCLP	CHROMIUM TOTAL/TCLP	LEAD TOTAL/TCLP	PCBS TOTAL
03/23/95	MYF10-COMP	COMPOSITE	NA	U	NA	U	NA
3/23/95	MYF11-COMP	Confirmation @ F-11 Grid	NA	U	NA	5.4	U
3/23/95	MYF12-COMP	Confirmation @ F-12 Grid	NA	U	NA	U	U
3/10/95	MYF13-COMP	Confirmation @ F-13 Grid	NA	U	NA	6	U
03/10/95	MYF14-COMP	Confirmation @ F-14 Grid	NA	U	NA	24	U
03/10/95	MYF14-WALL	Wall of the pad @ F-14	NA	U	NA	1800	U
03/10/95	MYF15-WALL	Wall of the pad @ F-15	NA	U	NA	6300	U
03/07/95	MYF15-COMP	Confirmation @ F-15 Grid	NA	1.6	NA	9.5	U
03/07/95	MYF16-COMP	Confirmation @ F-16 Grid	NA	8.0	NA	10	U
11/08/94	WY1108B	Confirmation @ G-2 Grid	NA	NA	NA	NA	ND*
11/08/94	WY1108A	Confirmation @ G-3 Grid	NA	NA	NA	NA	ND*
11/07/94	WY1107B(B)	G-6 Grid at 3.5 feet	NA	NA	NA	NA	ND*
02/22/95	MYG-9	Confirmation @ G-9 Grid	NA	5.1	NA	320	7.9
02/06/95	MYG10-COMP	Confirmation @ G-10 Grid	<9.6	<0.48	6.3	15	U
02/06/95	MYG11-COMP	Confirmation @ G-11 Grid	NA	<0.47	NA	18	U
02/27/95	MYG12-COMP	Confirmation @ G-12 Grid	NA	U	U	9.9	U
02/27/95	MYG14-RAIL 2	G-14 Grid Rail @ 2 feet	NA	32	NA	5,100	17.8
06/07/95	MYG14-CONFIRM	Confirmation @ G-14 Grid	NA	44	NA	4,700	11.8
03/07/95	MYG15-COMP	Confirmation @ G-15 Grid	NA	<0.48	NA	16	U
03/07/95	MYG16-COMP	Confirmation @ G-16 Grid	NA	<0.42	NA	7.8	U
03/11/95	MYH8-COMP	Confirmation @ H-8 Grid	NA	U	NA	8.8	U
02/22/95	MYH-9	Confirmation @ H-9 Grid	NA	1.3	NA	160	0.92



**Table 4**  
**U.S. EPA STANDARD SCRAP SITE**  
**REMOVAL ACTION CLEANUP CONFIRMATION SAMPLE RESULTS**

DATE SAMPLE COLLECTED	SAMPLE #	SAMPLE LOCATION	TOTAL CONCENTRATION IN Mg/Kg. TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP) CONCENTRATION IN MG/L				
			ARSENIC TOTAL/TCLP	CADMIUM TOTAL/TCLP	CHROMIUM TOTAL/TCLP	LEAD TOTAL/TCLP	PCBS TOTAL
06/07/95	MYH15-SURFACE	Confirmation @ H-15 Grid	NA	28	NA	3,800	56 <sup>1</sup>
05/16/95	H-20 RR Track Comp	Confirmation sampling-RR Tracks H-18 thru H-20	NA		NA		15 <sup>2</sup>
05/01/95	MYL14-Comp	Confirmation @ L-14	NA	<0.47	NA	12	U
05/01/95	MYL14-16 Sidewall	Sidewall along L-14, L-15, and L-16 Grid line	NA	2.4	NA	5,500	7.0
05/01/95	MYLM14-Sidewall	Sidewall along L-14 & M-14	NA	1.4	NA	2,600	1.9
05/01/95	MYL15-Comp	Confirmation @ L-15 Grid	NA	<0.46	NA	14	U
05/01/95	MYLM16-Sidewall	Sidewall between L-16 and M-16 Grids	NA	<0.60	NA	390	5.0
05/01/95	MYL16-Comp	Confirmation @ L-16 Grid	NA	<0.52	NA	13	U
05/11/95	MYL17-COMP	Confirmation @ L-17 Grid	NA				12 <sup>3</sup>
05/11/95	MYL18-COMP	Confirmation @ L-18 Grid	NA				12 <sup>3</sup>

<sup>1</sup> This grid was further excavated to one more foot. No sampling was done after excavation because the PCB concentration was close to the action level of 10 mg/kg.

<sup>2</sup> Because of cement slab over this wall, further excavation was not conducted.

ND - Non detect. Concentration below the instrument detection level.

BDL- Below the instrument detection level.

U - Non detect. Concentration below the instrument detection level.

NJ - Tentatively identified at estimated concentrations.

J - Estimated concentrations.

NA - Not analyzed.

\* - PCB Analysis done with GC/MS at E & E warehouse.